# FEDERAL BUREAU OF INVESTIGATION FOI/PA DELETED PAGE INFORMATION SHEET Civil Action# 07-cv-3240

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Page 294 ~ Duplicate;
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Page 298 ~ Duplicate;
Page 299 ~ Duplicate;
Page 300 ~ Duplicate;
Page 301 ~ Duplicate;
Page 302 ~ Duplicate;

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G. A. Bronson Post Office Box 588 Sacramento, California 95803

For the Plaintiff

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#### UNITED STATES DISTRICT COURT

#### FOR THE

#### EASTERN DISTRICT OF CALIFORNIA

GEORGE A. BRONSON,

Plaintiff,

vs.

.THE UNITED STATES OF AMERICA;

GOVERNOR EDMUND G. BROWN, Jr.; FEDERAL BUREAU OF INVESTIGATION AND DIRECTORS L.P. GRAY, CLARENCE ) KELLEY, WILLIAM RUCKELSHAUS; U.S.) 17 DEPT. OF JUSTICE, U.S. ATTORNEYS DWAYNE KEYES, DONALD HELLER; U.S.) 18 TREASURY DEPT., SECRET SERVICE; FEDERAL PROTECTIVE SERVICE/GSA, DIRECTOR, OFFICERS CLEMONS (BADGE) 3327), JAMES CHASTAINE, CLARENCE 20 L. SNELSON; LUV SECURITY SERVICE, OFFICERS GREER AND W.W. SMITH; LEON JAWORSKI; GEN. ALEXANDER HAIG; STATE OF CALIFORNIA, ATTOR-NEY GENERAL EVELLE J. YOUNGER, STATE CONTROLLER HOUSTON I. FLOUR-NOY, MARC POCHE, CALIFORNIA HIGH-WAY PATROL, COMMISSIONER GLENDON 24 B. CRAIG, STATE POLICE, CHIEF GUY )
R. OATES, OFFICERS L.D. SHERWOOD )
AND S.W. WESTON, RONALD REAGAN; LAW ENFORCEMENT ASSISTANCE ADMIN. U.S. ARMY; WINCHESTER/OLIN CORP., )
REMINGTON/DUPONT CO.; COLT INDUS.;)
SACRAMENTO COUNTY, SHERIFF DUANE 27 LOWE, D.A. JOHN PRICE; CITY OF SACRAMENTO, POLICE DEPT. CHIEF W.J. KINNEY; NRA; IACP; NAT'L 29 SHERIFFS ASSN; AT&T, PACIFIC TELE-

PHONE; WESTERN UNION; SMUD; L.A.

COUNTY, SHERIFF PITCHESS; CITY OF L.A., MAYOR T. BRADLEY, CHIEF ED.

5-76-447-PCW No. 8

## AMENDED COMPLAINT

(CONSPIRACIES AND ACTS IN VIOLATION OF CONSTITUTIONAL RIGHTS AND CIVIL RIGHTS, ANTI-TRUST LAWS; UNLAWFUL INTERFERENCE WITH BUSINESS AND TRADE RELATIONS; ASSAULT, BATTERY MAYHEM AND ATTEMPTED MURDER MISUSE OF POLICE POWER, FRAUD, LIBEL, SLANDER, ILLEGAL TELEPHONE INTER-FERENCE AND WIRETAPS, UNLAWFUL SEIZURE AND IMPRISONMENT, CONSPIRACY TO OBSTRUCT JUSTICE; DAMAGE TO BUSINESS PROPERTY INCOME, REPUTATION, TRADE: CONSPIRACY IN THE COMMISSION OF FEDERAL FUNDING BLACKMAIL.)

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DAVIS; and JOHN DOES ONE THROUGH Ronald Reagan-2746

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ONE HUNDRED,

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Defendants.

Plaintiff George A. Bronson, in propria persona, files this AMENDED COMPLAINT as a matter of course before service of a responsive pleading to his original complaint. F.R.Civ.P. Rule 15.

Plaintiff's original complaint was filed with the Clerk of the Court, United States District Court for the Eastern District of California on August 20, 1976. Because of related case material activity in the Superior Court in and for the County of Sacramento, plaintiff has received continuances from this Court on October 31, 1977 and January 3, 1978, pursuant to Local Rule 117.

## JURISDICTION

Plaintiff complains against defendants, and each of them, and alleges:

I

Plaintiff, GEORGE A. BRONSON, is President of Anchor International, Inc., a corporation incorporated under the laws of the State of California, having its principal place of business in the State of California; is a Yale graduate Inventor and Patent Holder of Record in the United States, NATO and other allied countries, and is a citizen of the State of California, whose business address is Post Office Box 588, Sacramento, California 95303.

II

This Court has jurisdiction of this cause under and by virtue of:

- 1. Title 28 of the United States Code, Section 1332, in that the matter in controversy exceeds the sum of ten thousand dollars (\$10,000.), exclusive of interest and costs, and is between:

  Ronald Reagan-2747
  - (1) Citizens of different States;
- (2) Citizens duly appointed, employed, and acting within their capacities as skilled professionals, elected or appointed, on behalf of the United States of America.

2. Title 28 of the United States Code, Sections 1331 and 1343, this being a suit in equity authorized by law, Title 42, United States Code, Section 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or useage of a State of rights, privileges, and immunities secured by the Constitution and the Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, Fourth Amendment, Sixth Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the Constitution of the United States.

- 3. Title 28 of the United States Code, Section 1343, for deprivation of civil rights, including assault by police officer acting under color of law, and to enjoin unconstitutional actions of state officials.
- 4. Title 28 of the United States Code, Sections 1346(b), 2671 et seq., for damages under the Federal Tort Claims Act.
- 5. Title 28 of the United States Code, Section 1337, for interference with contractual business relationships and interstate commerce.
- 6. Title 42 of the United States Code, Sections 1981, 1982, right to equal rights under the law.
- 7. Title 42 of the United States Code, Sections 1983, 1985, et seq., for deprivation of civil rights, and conspiracies and acts to interfere with civil rights.
- 8. Federal Election Campaign Law and Act, and actions thereunder. of 1971, as amended Reagan-2748
- 9. Controversies to which the United States is a party, United States Constitution, Article III, Section 2.
- 10. Title 15 of the United States Code, Sections 1,2 (Sherman Act), and Title 15, United States Code, Section 15 (Clayton

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Act), action for treble damages.

11. Title 28 of the United States Code, Sections 1346(b),
2671 et seq., Federal Tort Claims Act, as hereinafter more fully
appears in plaintiff's causes of action, ONE through SEVENTYFIVE, for civil actions against the United States within six (6)
years of right of action accruing, and for tort claims against
the United States within two (2) years of right of action accruing.

Ronald Reagan-2749

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12. Title 15 of the United States Code, Section 26, action for injunction under the Sherman Act.

13. Title 42, United States Code, Section 1986, action for failure to prevent conspiracy to interfere with civil rights (28 USC \$1343).

#### III

The true names and capacities of defendants JOHN DOES ONE
THROUGH ONE HUNDRED are at this time unknown to plaintiff who
sues said defendants by such fictitious names. Plaintiff is informed and believes and thereon alleges that the JOHN DOES ONE
THROUGH ONE HUNDRED defendants are responsible in some
mainer for the occurrences herein alleged and proximately
thereby caused injuries and damages to plaintiff as herein alleged

TV

Each and all of the acts of defendants alleged herein were done by defendants acting under the color and pretense of authority, statutes, Federal law, State law, regulations, and under the authority of their offices.

V

Defendants are, and at all times herein mentioned were, and to the best of plaintiff's knowledge are now duly appointed, employed, and acting within their capacities as skilled professionals, elected or appointed, within the Federal Government, State of California Government, County of Sacramento Government, City of Sacramento Government, the Department of Defense, the United States Army, Federal Bureau of Infestigation, Federal Protective Service, or public corporations, or other businesses, organized and existing under the laws of California or with place of business addresses in this State in Sacramento County.

Ronald Reagan-2750

VI

Acts complained of herein took place in Sacramento County, CA and elsewhere.

#### FIRST CAUSE OF ACTION

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Dollars.

The Court has jurisdiction in this matter under Title 23, United States Code, Secs. 1343, 1346(b), 2671 et seq., for deprivation of civil rights, assaults by federal police officers acting 6 under color of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Art. III, Sec. 2; Title 42, United States Code, Secs 1981 et seq., particularly **ss**1982,1983,1935,1986, interference 11 with Civil Rights; redress for violations of the First, Fourth, 12 and Sixth Amendments, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution; Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law, Title 42, United States Code, Sec. 1993, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or useage 22 of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the Constitution of the United States. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand (\$10,000.00) Ronald Reagan-2751

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

of the privileges and immunities guaranteed to plaintiff by Amend-ments I, IV, VI, VII, and XIV to the United States Constitution.

TV

Plaintiff BRONSON is a citizen of the United States whose business address is Post Office Box 588, Sacramento, California 95303, the United States Post Office Building, 801 I Street (9th and I Streets), Sacramento, California.

V

## Defendants are:

- 1. Def. FEDERAL PROTECTIVE SERVICE of the UNITED STATES (GSA)
  GENERAL SERVICES ADMINISTRATION. Headquarters of the GSA are
  Washington, D.C. Local headquarters of the FEDERAL PROTECTIVE
  SERVICE (FPS) is 650 Capitol Mall, Sacramento, California.
- 2. Defs. OFFICERS CLEMONS (BADGE 3327), JAMES CHASTAINE, and CLARENCE SNELSON are uniformed agents and employees of the Sacramento FEDERAL PROTECTIVE SERVICE.
- 3. Defs. OFFICERS GREER and W.W. SMITH (BADGE 30), uniformed employees of LUV SECURITY SERVICE, Sacramento, California.
- 4. Def. LUV SECURITY SERVICE, Sacramento, California, by attorney Michael Sands, Sacramento, California, is under contract to the FEDERAL PROTECTIVE SERVICE to performs services as contracted.
- 5. Defs. FEDERAL BUREAU OF INVESTIGATION and DIRECTOR CLAR-ENCE KELLEY are headquartered in Washington, D.C., with local address of 2800 Cottage Way, Sacramento, California.
  - 6. Def. "VICTOR MARTINEZ".

    Ronald Reagan-2752

    VI -A

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such ficititious names for damages caused and proximately caused to plaintiff.

## VI -B

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 of the United States Code, Sections 1343 and 1346(b); Title 42 of the United States Code, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and XIV to the Constitution of the United States.

## VI -C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, herein-after and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pretense of law.

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That on August 22, 1975, in the County of Sacramento, State of California, in the United States Post Office, 801 "I" Street, Sacramento, California, defendants FPS OFFICERS CHASTAINE AND CLEMONS and LUV OFFICER GREER, under color of authority and pretense of law, and armed with deadly weapons, and each of them, maliciously, wantonly, willfully, recklessly, wrongfully, viciously, and violently, without cause or provocation, attacked, beat, strangled, handcuffed, illegally searched and seized, falsely ar-10 rested, falsely imprisoned, restrained, and struck plaintiff in and about the face and head and other parts of his body, and made other multiple physical abuses and injuries to plaintiff which required plaintiff to go to the hospital for care and treatment, violating the securities, privileges and immunities guaranteed to plaintiff under the I, IV, V, VI, VII, and XIV Amendments to the Constitution of the United States.

VI

That on August 22, 1975, plaintiff's right of privacy was wrongfully, unlawfully, conspiratorially and maliciously abused in the above-mentioned wrongful acts and conspiracies of defendants, and each of them, by the attacks, beatings, strangulations, handcuffing, illegal search and seizure, false arrest, false imprisonment, restraint, and striking of plaintiff in and about the face and head and other parts of plaintiff's body.

vii Ronald Reagan-2754

The above-mentioned wrongful and conspiratorial and malicious acts constituted an invasion of plaintiff's right of privacy in that plaintiff in no way consented to or authorized the unreasonable search, seizure, beating, handcuffing, strangulation, false imprisonment, and other restraints, nor did plaintiff submit himself voluntarily to the control and custody of the defendants, nor did plaintiff authorize any of these wrongful acts against his

person, all of these wrongful acts being done willfully, maliciously, intentionally, and negligently against plaintiff by force from three (3) federal officers' beating plaintiff.

VIII

The above-mentioned acts and conduct of the defendants, and each of them, claimed by them to be under federal authority, constituted an abuse of their federal authority and was not within their scope of employment as federal agents in that their acts and conduct was not based on the exercise or performance of a discretionary function or duty assumed by them as agents of the FEDERAL PROTECTIVE SERVICE and were not acts and conduct done pursuant to the regulations of the FEDERAL PROTECTIVE SERVICE and were acts performed within the scope of defendants employment BUT WITHOUT EXERCISING DUE CARE WHILE ACTING WITHIN THE SCOPE OF THEIR EMPLOYMENT, and defendants, and each of them, acted in fraud, corruption or malice.

IX

As a result of the above-mentioned conduct of the defendants, and each of them, plaintiff was deprived of rights, privileges, and immunities secured to him by the Constitution and Laws of the United States in that such conduct constituted an arbitrary intrusion by defendants(s) upon the security of plaintiff's privacy and body, thereby depriving plaintiff of life, liberty, and property without due process of law and plaintiff is entitled to relief under USC, Title 42, \$1983.

x

That by reason of the injuries inflicted by defendants, and each of them, plaintiff was wounded and has suffered bodily pain and discomfort, and has suffered great pain of mind and mental anguish and emotional distress.

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That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies, by illegally beating, strangling, handcuffing, and falsely imprisoning plaintiff.

#### IIX

That by reason of the injuries inflicted by defendants, and each of them, plaintiff was subjected to humiliation and indignity and suffered great mental pain and suffering, the damages and sums which shall be proved at trial.

### XIII

That all of the foregoing acts were done and committed and caused by defendants, and each of them, with malice and ill will and with the intent and design of injuring and oppressing plaintiff, and in conspiracy with others, and for that reason plaintiff is entitled to and asks for punitive or exemplary damages as shall be demonstrated at trial, and as incorporated herein under DAMAGES from page 274.

## XIV

That by reason of the injuries inflicted by defendants, and each of them, plaintiff was compelled to and did expend sums for 24 medical care and the employment of physicians and surgeons; by virtue of which plaintiff has incurred dabts in amounts to be demonstrated at trial, which sums were necessary, reasonable and proper.

#### XV

That by reason of the injuries inflicted upon plaintiff by

Ronald Reagan-2756

defendants, and each of them, plaintiff will continue to suffer great pain and anguish of body and mind, and earning capacity, and plaintiff's injuries and damages shall be proved at trial; and as incorporated herein under DAMAGES from page 274.

X

WHEREFORE, plaintiff demands judgment against defendants, and each of them, and others, in the sum and costs to be demonstrated at trial, and incorporated under DAMAGES on page 274, compensatory, punitive, and such other relief deemed just and proper.

## SECOND CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in Paragraphs I-VI, JURISDICTION, and Paragraphs I-X, FIRST CAUSE OF ACTION.

II

This Court has jurisdiction under Title 42, USC, Sec. 1981 et seg., and violations of Due Process and Equal Protection Clauses of the Fourteenth Amendment to the U.S. Constitution.

III

Plaintiff is a citizen of the United States whose business address is Post Office Box 588, Sacramento, California.

IV

Plaintiff believes defendant's name of "Victor Martinez" is an alias, and so sues said "Victor Martinez" as a JOHN DOE-ONE THROUGH ONE HUNDRED. Ronald Reagan-2757

V

On August 22, 1975, at 301 I Street, Sacramento, California, the Federal Post Office Building at 3th and I Streets, Sacramen—
without cause or provocation to, defendant "Martinez" assaulted plaintiff by wrongfully, unlaw fully, intentionally, and menacingly tracking, following, "dog-ging" plaintiff Eronson inside the U.S. Post Office, after many months of menacingly tracking, following, "dogging" plaintiff

ERONSON cutside the U.S. Post Office and throughout Sacramento County. Each and every time defendant "MARTINEZ" was around plaintiff, plaintiff was immediately alarmed and apprehensive for his safety because of "MARTINEZ"'s concealed weapon on his person. Plaintiff was constantly, fearfully, and warily shifting his standing, sitting, walking, or driving positions in counter movement to the malicious, wanton, willful or reckless disregard for plaintiff's rights exhibited by one "MARTINEZ".

VI

On August 22, 1975, in the United States Post Office, 8th and I Streets, Sacramento, defendant "MARTINEZ" appeared after plaintiff, and plaintiff feared for his life right in the Post Office by "MARTINEZ" gestures, walk, following, watching, of plaintiff. Plaintiff was so alarmed, fearful and apprehensive with the wrongful behavior of "MARTINEZ" in the Federal Building, that plaintiff warned defendants UNITED STATES GOVERNMENT, FEDERAL PROTECTIVE SERVICE, LUV SECURITY SERVICE, FPS OFFICERS CLEMONS AND CHASTAINE, and LUV OFFICERS GREER and W.W. SMITH that plaintiff intended to place said "MARTINEZ" under citizen's arrest for harassment of plaintiff in the federal building.

VII

That on August 22, 1975, defendants, and each of them, knowingly and willfully organized and caused to be organized a new
conspiracy and agreement among themselves, and each of them, to
stop plaintiff BRONSON by forcible means from placing defendant
"MARTINEZ" under citizens arrest, or to stop plaintiff from
causing an arrest warrant to be issued for one "MARTINEZ", either
from federal or local agencies, or exercising his privileges.

VIII Reagan-2758

That on August 22, 1975, defendants FPS and LUV officers did assault, beat, strangle, handcuff, illegally search and seize, falsely arrest, falsely imprison, and make other multiple

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without cause or provocation physical abuses and injuries to plaintiff/under color of authority and pretense of law, and armed with deadly weapons. Plaintiff does hereby incorporate and adopt by reference all allegations set forth in plaintiff's FIRST CAUSE OF ACTION, violating security of his person, I, IV, VI, VII, and XIV Amendments to U.S. Constitution.

IX

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore complainted of. Plaintiff was not arrested, was deprived immunities and privileges. X

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright and injuries thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

ΧI

WHEREFORE, Plaintiff demands judgment against defendants, and each of them, the sum and costs of which shall be proved at trial, compensatory and punitive damages; and just and proper relief. THIRD CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations of jurisdiction set forth in Paragraph I through VI, JURISDICTION; 28 U.S.C. /51346(b); 42 U.S.C. 51981 et seq.

Ronald Reagan-2759

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereindeprivations of privbefore and hereinafter complained of, for ileges and immunities, Amendments I, IV, VI, VII, XIV, under color of

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#### III -A

Plaintiff is a citizen of the United States; UNITED STATES is a party; amount in controversy exceeds ten thousand dollars.

#### III -B

On August 22, 1975, defendants FPS OFFICER JAMES CHASTAINE and LUV OFFICER GREER forcibly took plaintiff from the United States Post Office and forcibly took plaintiff to his business automobile parked in a private parking lot one block away. Plaintiff was menaced by said defendants, and each of the, for some time at plaintiff's business automobile. Plaintiff not only feared for his continued personal safety from a deadly weapon or fists, but feared for the personal safety of innocent by-standers as well. Defendants had no cause or provacation to so act.

IV

That by reason of said acts plaintiff was placed in great fear for his life and physical well being, and the lives and physical well being of innocent by-standers, defendants then and there having the present ability to continue to beat plaintiff, and carry out their threats to kill plaintiff and/or beat, strangle, assault, handcuff, falsely arrest, falsely imprison, falsely search and seize, plaintiff again, acting under color of authority and pretense of law. Plaintiff was not arrested.

V

That defendants' acts and threatened acts violate the First,

Fourth, Sixth, Seventh and Fourteenth Amendments to the Constitu
tion of the United States, depriving plaintiff privileges and immunities.

VI

That by reason of the wrongful and malicious acts of defenwounds

dants, and each of them, and the pain/and fright caused plaintiff,

plaintiff has suffered extreme and severe mental anguish, physical

pain, and business losses and has been injured in mind and body

and earning capacity as will be demonstrated at trial; DAMAGES

Ronald Reagan-2760

VII

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the sum and costs to be proved at trial, compensa-

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tory damages, punitive damages, and grant of such other relief that this Court may deem just and proper.

## FOURTH CAUSE OF ACTION

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in Paragraphs I-VI, JURISDICTION (page

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Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinbefore and hereinafter complained of.

III

The Court has jurisdiction in this matter under Title 29, United States Code, Secs. 1343, 1346(b), 2671 et seq., for deprivation of civil rights, assaults by police officers acting under color of law, the enjoinment of unconstitional actions of state officials, for damages under the violations of the First, Fourth, Sixth, Seventh Amendments, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution; Title 28, United States Code, Secs. 1331 et seq.; Title 42, United States Code, Secs. 1981 et seq., particularly \$5 1982, 21 1933, 1935, 1986, interference with Civil Rights, deprivation 22 under color of statute, ordinance, regulation, custom or useage 23 of a statute, ordinance, regulation, custom or useage of a State of rights, privileges, and immunities secured by the Constitution and laws of the United States; and controversies to which the United States is a party, United States Constitution, Art. III, Sec. 2. Ronald Reagan-2761

IV

Plaintiff is a citizen of the United States, and the amount in controversy exceed Ten Thousand (\$10,000.00) Dollars, exclusive of interest and costs.

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Defendants are:

- Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER, headquarters address of 555 Capitol Mall, Sacramento, California.
  - Def. J.C. HARRIS, Office of Attorney General.

VI

the true names and capacities of Plaintiff does not know defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and Plaintherefore sues these defendants by such fictitious names. tiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed and believes and thereon alleges that each of the fictitiously named defendants is responsible in some manner for the occurrences herein, hereinbefore, and hereinafter alleged, and that Plaintiff's damages as herein alleged were caused and proximately caused by such defendants, acting under color of authority and pretense of law.

VII

In 1972, defendants STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER, security officer, J.C. HARRIS refused to accent plaintiff's filing of charges of criminal acts in California and wrongfully, unlawfully, intentionally, and violently assaulted without cause or provocation plaintiff/by threatening plaintiff with "... we know where you We can come and get you at the drop of a sombrero...", with such venom and menage in defendants' Harris' voice and words that plaintiff was immediately placed in great fear for his life and physical well being, deprived of privileges and immunities. Ronald Reagan-2762 VIII

That by reason of the wrongful and malicious acts of defendants and of the fright caused plaintiff, plaintiff began immediiately to look around thinking state law enforcement officers, mgents, employees, or others, were "on the way", and that plain-

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tiff shortly would be unlawfully beaten, maimed, murdered, harassed, or falsely arrested on the spot by armed officers under
the color of authority and law breaking down door, - guns drawn,
in malicious, wanton, willful or reckless disregard for plaintiff's
rights and the rights of others.

IX

That in 1972, defendants, and each of them, knowingly and willfully conspired and agreed among themselves to suppress and withhold from law enforcement wrongfully plaintiff BRONSON's new lifesaving firearms and related technologies.

.**X**...

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore complained of, acting in official capacity under color of law.

XI

By reason of the wrongful, intentional, conspiratorial, and malicious acts of defendants, and each of them, and of the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain and has been injured in mind and body, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page

Ronald Reagan-2763

XII

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the sum and costs of which shall be proved at trial, compensatory and punitive damages, and just and proper relief.

## FIFTH CAUSE OF ACTION

Ι

plaintiff does hereby incorporate and adopt by reference, all allegations set forth in Paragraphs I through VI, JURISDIC-TION (page 2); 23 USC 1346(b); 42 USC 51981 et seq; 28 USC 51343.

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Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, herein-

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before and hereinafter complained of.

#### III

Plaintiff is a citizen of the United States whose business address is Post Office Box 588, Sacramento, California, and the amount in controversy exceeds ten thousand dollars (\$10,000.), exclusive of interest and costs, 1

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOZS ONE THROUGH ONE HUNDRED, and therefore sues these defendants by such ficticious names for damages caused and proximately caused to plaintiff.

On August 17, 1972, Defendants STATE OF CALIFORNIA, STATE ATTORNEY GENERAL EVELLE J. YOUNGER, special agent ANDREW TICKVITZA without just cause or provacat: wrongfully, unlawfully and intentionally/conspired and acted to deliberately intimidate and harass person known by plaintiff at that person's place of employment in malicious, wanton, willful or reckless and conspiratorial disregard for the rights and privacy of plaintiff and others. Under the color of authority, defendants' Tickvitza's conduct and words caused immediate fear, apprehansion and alarm for that person's safety, the safety of Plaintiff BRONSON, and the safety of others.

Ronald Reagan-2764 VI.

When Plaintiff BRONSON was informed of Defendants' Tickvitza's wrongful, malicious conduct toward person known to plaintiff, plaintiff was immediately alarmed and apprehensive for his personal safety and well being, and feared for the safety and Plaintiff feared that law enforcement well being of others. officers, under color of authority and law, were immediately acting in official capacities, and deprive plaintiff, under color of

such police authority, viciously attack plaintiff with deadly Constitutional weapons, ambush plaintiff, and deprive plaintiff of/privileges and immunities by force, violence, maiming, attempted murder on plaintiff and others. Plaintiff and others remained in constant fear and dread for their safety from that time forward.

VII

That from 1972 forward, defendants, and each of them, knowingly and willfully conspired and agreed among themselves to suppress and wrongfully withhold from law enforcement Plaintiff BRONSON's new lifesaving firearms and related technologies by terror tactics and threats to the lives and personal safety of plaintiff and others, violating I, IV, VI, VII and XIV Amendments.

VIII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore complained of.

IX

By reason of the wrongful, intentional, conspiratorial, and malicious acts of defendants, and each of them, and of the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain and has been injured in mind and body, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page

Ronald Reagan-2765

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WHEREFORE, plaintiff demands judgment against defendants, and each of them, the sum and costs of which shall be proved at trial, and compensatory and punitive damages, & just and proper relief.

## SIXTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in Paragraph I-VI, JURISDICTION (pg 2);

- 16 -

\$1343, Title 28, United States Code,/\$1346(b); 42 USC \$1981 et seg.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein complained of, hereinafter complained of, and hereinbefore complained of.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE MUNDRED, and therefore sues these defendants by such fictitious names. Plaintiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed and believes and thereon alleges that each of the fictitiously named defendants is responsible in some manner for the occurrences herein, hereinbefore, and hereinafter alleged, and that Plaintiff's damages as herein alleged were caused and proximately caused by such defendants.

Frequently in 1973, on April 15/25,1974, May 3, 1974, May 14, 1974, Movember 5, 1976, June 4, 1977, and February 25, 1973, defendants JOHN DODS ONE THROUGH ONE MUNDRED have acted with malicious, wanton, willful or reckless disregard for plaintiff's rights and safety, and the rights and safety of others, and without cause or provocation sabotaged plaintiff's business equipment to the severe extent that plaintiff and others would be permanently maimed or killed in attempting to regularly use the sabotaged equipment.

Ronald Reagan-2766

That by reason of the wrongful and malicious acts of defendants and of the immediate and continuing alarm, fear, apprehension for plaintiff's personal safety and well being

was deprived privileges and immunities guaranteed to plaintiff in I,IV,VI,VII and KIV Amendments. Plaintiff feared that at any time defendants, and each of them, some members of the law enforcement community with duty to protect plaintiff and others,—not harm them, would unlawfully murder, permanently maim or destroy plaintiff and others, and business equipment regularly used.

VII

That in 1972 forward, defendants, and each of them, know-ingly and willfully conspired and agreed among themselves to suppress and withhold from law enforcement, wrongfully, plaintiff BRONSON's new lifesaving firearms and related technologies by terror tectics and threats to the lives and personal safety of plaintiff and others, without cause or provocation.

VIII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore complainted of.

IK

Ey reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAM-AGES from page 274.

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WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be demonstrated at trial, compensatory damages, punitive damages, and the grant of such other relief as this Court may Ronald Reagan-2767 deem just and proper.

## SEVENTH CAUSE OF ACTION

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Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in Paragraphs"I through VI, JURISDIC-**\$1343** TION (page 2); 28 USC/\$1346(b); 42 USC \$1981 et seq.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action hereinbefore and hereinafter complained of.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff Ronald Reagan-2768

On or about August 26, 1973, defendants AMERICAN TELEPHONE AND TELEGRAPH, PACIFIC TELEPHONE AND TELEGRAPH, agents and employees wrongfully, unlawfully, intentionally, and violently assaulted without cause or provocation plaintiff by threatening plaintiff/with "... punch you in the nose...", and refused to permit plaintiff to file criminal charges of illegal wiretapping, eavesdropping, impersonation of an FBI agent on an illegally and intentionally interfered with and disrupted business telephone line, etc., hereinbefore and herein-27 after complained of. Under color of authority of a public utility 28 charging for the services rendered to plaintiff and others, defen-29 dants' employee and agent acted to throw plaintiff bodily from 30 the business premises of the public utility, and by their acts, 31 voice and words made plaintiff immediately in great fear for his 32 life and physical well being, causing plaintiff to leave the business premises without completing plaintiff's lawful business.

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Plaintiff BRONSON was immediately alarmed, fearful, and apprehensive for his personal safety and well being, and for the safety and well being of others. Plaintiff feared that defendants, and each of them, were shortly to beat, maim or murder plaintiff, and as defendants, and each of them, intended, plaintiff's well founded criminal charges of illegal wiretapping and other illegal electronic invasion of plaintiff's business equipment, were ignored and continued to present time by said defendants, and each of them; defendants, and each of them refuse to investigate, remove and otherwise take corrective action.

VII

That in 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, to suppress and wrongfully withhold from law enforcement plaintiff ERONSON's new lifesaving firearms and related technologies by illegal acts and conspiracies to illegally wiretap plaintiff's business telephone without cause.

#### VIII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore Ronald Reagan-2769 complained of.

IX

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, and been deprived privileges and immunities guaranteed to plaintiff by Amendments I, IV, VI, VII, XIV, the nature and extent of which shall be proved at trial; DAMAGES pg 274.

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

# EIGHTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28, USC \$\$1343,1346(b); 42 USC \$1981 et seq.; the Fourteenth Amendment to the Constitution;

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action hereinbefore and hereinafter complained of, for loss of rights under color of authority, particularly as protected by the Fourth Amendment to the Constitution of the United States.

III

Plaintiff is a citizen of the United States, the UNITED STATES is a party, and the amount in controversy exceed, exclusive of interests and costs, Ten Thousand Dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herein \*\* JOHN DOES DME THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

Ronald Reagan-2770

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Defendants are:

Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTOR CLARENCE

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## M. KELLEY.

- 2. Def. AMERICAN TELEPHONE AND TELEGRAPH COMPANY (AT&T), headquarters 195 Broadway, New York, New York 10007.
- 3. Def. PACIFIC TELEPHONE AND TELEGRAPH COMPANY DIVISION OF AT&T, Northern California Headquarters, 140 New Montgomery Street, San Francisco, California 94105; Sacramento Arms Headquarters, 1407 "J" Street, Sacramento, California.
- 4. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J.
  YOUNGER, GOVERNOR EDMUND G. BROWN, Jr., GOVERNOR RONALD REAGAN,
  State Capitol, Sacramento, California.

VI

on the following example dates, 1973: 2/9,13; 3/12-15; 7/13; 8/30,31; 9/4,24; 11/20; 1974: 1/10,16; 2/7,28; 5/8,14; 11/8,14; 12/6,7; 1975: 1/15; 2/4,5,8,9,11; 4/21,22; 7/8; 9/9; 1976: 1/19, defendants agents and employees illegally electronically caused or forced plaintiff's business telephone to "ring" (strange sound) or "malfunction", especially during off non-business hours. Without Court order, search warrant, without cause or provocation, under color of authority and pretense of law, defendants, and each of them, maintained and maintain to present illegal surveillance of plaintiff's business telephone in malicious, wanton, willful, intentional, wrongful, conspiratorial disregard for the rights of plaintiff and others each and every time, depriving to plaintiff privileges and immunities guaranteed by Amendments I, IV, V, VI, VII, and XIV of the Consitution of the United States.

VII ..

That each and every time defendant(s) did the acts and things herein complained of, defendant(s) invaded plaintiff's right of privacy and right to uninterrupted, nonmonitored business telephone use for lawful purposes.

Ronald Reagan-2771

VIII

The above-mentioned wrongful, conspiratorial, malicious, warrantless, and willful acts constituted an invasion of plaintiff's

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right of privacy in that plaintiff in no way consented to or author ized the warrantless search and illegal wiretap and electronic invasion of plaintiff's business telephone, nor did plaintiff submit voluntarily to these wrongful invasions by wiretapping illegally of plaintiff's business telephone.

IX ·

The above-mentioned acts and conduct of the defendants, and each of them, claimed by them to be under federal and/or state and/or regulated public utility authority, constituted and abuse of their federal and/or state and/or regulated public utility authority and was not within their scope of employment as federal and/or state and/or regulated public utility agents, employees or servants, in that their acts and conduct were not based on the exercise or performance of discretionary function or duty assumed by them as agents or employees or servants of the federal government's FEDERAL BUREAU OF INVESTIGATION and/or state government's ATTORNEY GENERAL'S OFFICE and/or regulated public utility and were not acts and conduct done pursuant to the regulations of the UNITED STATES ATTORNEY GENERAL/FEDERAL BUREAU OF INVESTIGATION and/or STATE ATTORNEY GENERAL'S OFFICE and/or regulated public TELEPHONE utility and were acts performed within the scope of defendant(s) employment but without exercising due care while acting within the scope of their employment, and defendants, and each of them, acted in fraud, corruption or malice.
Ronald Reagan-2772

X

As a result of the above-mentioned conduct of the defendants, and each of them, plaintiff was deprived of rights, privileges, and immunities secured to him by the Constitution and Laws of the United States in that such conduct constituted an arbitrary intrusion by defendant(s) upon the security of plaintiff's privacy and body, thereby depriving plaintiff of life, liberty, and property without due process of law and plaintiff is entitled to re-

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lief under Title 42 of the United States Code under Section 1983. XI That by reason of the injuries inflicted by defendants, and each of them, plaintiff was frightened and has suffered bodily pain and discomfort, and has suffered great pain of mind and mental anguish and emotional distress. XII That from 1972 to present time, defendants, and such of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforce-12 ment plaintiff's new lifesaving firearms and related technologies by illegal acts 

Ronald Reagan-2773

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and conspliracies to illegally viretap plaintiff's business telephone without cause or provocation under color of authority.

7.5

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore complained of.

XI

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAM-AGES from page 274.

XII

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, sum and costs to be proved at trial, and other just and proper relief.

## NINTH CAUSE OF ACTION

I

plaintiff does hereby incorporate and adopt by reference,
all allegations set forth in Paragraph I-VI, JURISDICTION, Title
\$1343,
28 U.S.C./\$1346(b); 42 USC \$1981 et seq; Amendment XIV.

II

plaintiff does hereby incorporate and adopt by reference,
all allegations set forth in all causes of action hereinbefore and
hereinafter complained of, loss of rights under color of authority
Ronald Reagan-2774
III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars; deprivations to Due Process and Equal Protection Clauses of Amendment XIV, Constitution

## Ronald Reagan-2775

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUMDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

From 1972 to present time, defendants CITY OF SACRAMENTO,

SACRAMENTO POLICE DEPARTMENT, POLICE CHIEF WILLIAM J. KINNEY,
without cause or provocation,
agents and employees, wrongfully, unlawfully, intentionally, and
maliciously assaulted plaintiff with deadly weapons (guns and
cars), and did other wrongful acts. Defendants' uniformed officers repeatedly drove CITY OF SACRAMENTO motor vehicles and harassed, followed, stalked, tracked, attempted to ram plaintiff's
business automobile, and otherwise abuse plaintiff, as plaintiff
conducted plaintiff's lawful business. Further, defendants, and
each of them, did, under color of authority and pretense of law:

- (1) Track plaintiff through the streets of Sacramento by CITY OF SACRAMENTO decaled vehicles and uniformed officers of the SACRAMENTO POLICE DEPARTMENT throughout the summer of 1973, and especially January 23, 1974 and May 8, 1974; followed plaintiff for blocks at a time in 1975 and 1976, especially May 5, 1975, February 10, 1976, and April 25, 1976.
- (2) Come close enough to plaintiff during the summer of 1974 and on July 23, 1975 for plaintiff to identify "BADGE NO. 295" of the CITY OF SACRAMENTO POLICE DEPARTMENT.
- (3) Come close enough to plaintiff for plaintiff to identiby "BADGE NO. 341", OFFICER GORSKI OF THE SACRAMENTO POLICE DEPART-MENT on October 3, 1974 and May 14, 1975.
- (4) That on October 3, 1974, defendants' OFFICER GORSKI tracked and menaced plaintiff all over McKinley Park, Sacramento.
- (5) That the attempted ramming of plaintiff's legally parked business vehicle occurred on or about February 10, 1975.

of lawful, unharassed use of CITY OF SACRAMENTO streets.

VI

That from 1972 forward, defendants, and each of them, know-ingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally acting and conspiring to assault plaintiff with deadly weapons repeatedly.

#### VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore complained of, under color of authority and pretense of law.

VII

Sy reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved attrial, and as incorporated herein under DAMAGES from page 274.

## VIII

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, sum and costs to be proved at trial, and other just and proper relief from Court.

## TENTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference,
all allegations set forth in Paragraphs I-VI, JURISDICTION, Title
\$1343,
23 U.S.C./\$1346(b); 42 USC \$1931 et seq., Amendment XIV.

## Tr Ronald Reagan-2776

Plaintiff does hereby incorporate and adopt by reference,

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all allegations set forth herein, deprivations of privileges and immunities Constitutionally guaranteed under color of authority.

III

plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV

plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

On or about January 23, 1974, defendants STATE OF CALIFORNIA.

STATE CONTROLLER HOUSTON I. FLOURNOY caused defendants STATEOF

CALIFORNIA, STATE POLICE, and others, to wrongfully, unlawfully, intentionally, and violently assault plaintiff with deadly weap—without cause or provocation.

ons on private business property. Defendants, and each of them, sent state agents and employees in two (2) cars to willfully, unlawfully and violently use force on plaintiff, or other malicious, wanton, willful or reckless disregard for plaintiff's rights. Defendants' agents and employees trespassed on business property and prevented plaintiff from leaving building. Defendants' agents and employees sat in the cars for some time, assaulting plaintiff, humiliating, outraging and embarrassing plaintiff, and prevented plaintiff from conducting his lawful business activities.

Ronald Reagan-7777

Ronald Reagan-2777

That in 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting plaintiff, and deprived plaintiff of privileges and immunities guaranteed by the Constitution under color of authority

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law

VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, sum and costs to be proved at trial, and other relief deemed just and proper.

## ELEVENTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in Paragraphs I-VI, JURISDICTION, Title **s**1343, 23 U.S.C./51346(b); 42 USC 51981 Et seq.; Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth herein, deprivations of privileges and immunities Constitutionally guaranteed under color of authority.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceed ten thousand dollars. Ronald Reagan-2778

Plaintiff does not know the true names and capacities of defendants sued herin as JOHN DOES ONE THROUGH ONE HUNDRED, and

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therefore sues these defendants, and each of them, by such factitious names for damages caused and proximately caused to plaintiff.

V

On or about January 23, 1976, defendants STATE OF CALIFORNIA, CALIFORNIA HIGHWAY PATROL, agents and employees, acting under without cause or provocation, color of authority and pretense of law, operated a pursuit plane wrongfully, unlawfully, intentionally, maliciously, and violently in assault on plaintiff while taking his usual therapeutic morning walk at Miller Park, a walk known to law enforcement agents and employees. Defendants made roaring, wide-throttle swoop too law over plaintiff, circling plaintiff in a roaring low "U" turn. Said defendants, and each of them, acted in malice, wanton, wilful or reckless disregard for plaintiff's rights, and almost burst plaintiff's eardrums, caused violent, blinding headache, and rendered plaintiff unable to drive for several hours.

VI

That in 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy
and agreement among themselves, and each of them, and with others,
to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting and battering plaintiff.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law.

Ronald Reagan-2779

#### VIII

By reason of the wrongful, intentional, and malicious acts wounds and of defendants, and each of them, and the/fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental an-

guish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, sum and costs to be proved at trial, and such other relief deemed just and proper.

## TWELFTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action filed herein.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 USC \$1343, (\$1346(b); 42 USC \$1981 et seg; Equal Protection Clause XIV Amend.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

Ronald Reagan-2780

On or about February 3, 1976, defendants STATE OF CALIFORNIA, without cause or provocation CALIFORNIA HIGHWAY PATROL, and others, retaliated against plaintiff for reporting on or about January 23, 1976, to defendant CALIFORNIA STATE HIGHWAY PATROL OFFICIALS, and others, that defendants illlegally, unlawfully, and negligently flew defendant's pursuit plane in diving, circling assault of plaintiff on January 23, 1976.

Defendants, under color of authority and pretense of law, tracked,

"dogged", and harassed plaintiff on the streets of Sacramento while plaintiff was attempting to conduct his lawful business.

VI

That from 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting plaintiff.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law, and deprived plaintiff of privileges and immunities from harm.

#### VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, which shall be proved at trial, and other relief deemed just and proper by Court

## THIRTEENTH CAUSE OF ACTION

Ronald Reagan-2781

Plaintiff does hereby incorporate and adopt by reference.

all allegations set forth in Paragraphs I-VI, JURISDICTION, Title \$1343,

23 U.S.C./\$1346(b); 42 USC \$1931 et seq; Amendment XIV.

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Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action filed and complained of herein, for deprivations under color of authority.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH OME HUMDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff

On or about February 8, 1974, defendants STATE OF CALIFORNIA and CHIEF GUY R. OATES, CALIFORNIA STATE POLICE / assaulted, falsely arrested, and falsely without cause or provocation imprisoned plaintiff/in the California State Capitol, and refused to permit plaintiff to leave the offices of defendant STATE POLICE WHEN PLAINTIFF DEMANDED TO DO SO. Said defendants, and each of them, stopped plaintiff from exercising his right to freedom of speech, due process of law, and right to conduct plaintiff's lawful business in a lawful manner, and the right to pursue plaintiff's lawful activities in a lawful manner without intimidation and interference and malicious disregard for plaintiff's rights under the color of authority and pretense of law.

v Ronald Reagan-2782

That from 1972 forward, defendants, and each of them, know-27 ||ingly and willfully organized and caused to be organized conspir-28 acy and agreement among themselves, and each of them, and with 29 others, to suppress and wrongfully withhold from law enforcement 30 plaintiff's new lifesaving firearms and related technologies by 31 |illegally assaulting, falsely imprisoning and falsely arresting 32 plaintiff, depriving plaintiff of Constitutional privileges and imVII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complainted of, acting under color of authority and pretense of law.

VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

wherefore, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, sum and costs to be proved at trial, and other relief deemed just and proper.

## FOURTEENTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 USC \$1343, /\$1346(b); 42 USC \$1981 et seq.; Amendment XIV, U.S. Constitution.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein complained of for loss of privileges and immunities guaranteed plaintiff.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

Ronald Reagan-2783

IV

Plaintiff does not know the true names and capacities of de-

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fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

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On or about September 29, 1972, defendants STATE OF CALI-FORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER, and others, agents and employees, under color of authority and pretense of law, harassed, abused, intimidated, embarrassed, humiliated, restrained, and otherwise obstructed and interfered with plaintiff in the without cause or provocation. U.S. Post Office, 8th and I Streets, Sacramento./ One agent or employee of defendants identified himself as a "Mr. Baier". Defendants agents and employees were not only accosting plaintiff for defendant CALIFAORNIA STATE ATTORNEY GENERAL YOUNGER, but also for defendant FEDERAL BUREAU OF INVESTIGATION and the NIXON ADMINISTRATION.

VI

Plaintiff was obstructed from leaving the post office as he wished by said two (2) agents and employees of defendants acting under color of authority and pretense of law. Plaintiff was fearful and apprehensive about being attacked and "jumped" by two (2) armed men. Plaintiff demanded that said defendants, their agents and employees, and each of them, submit all questions to plaintiff in writing and addressed to plaintiff's attorney. Said defendants refused and forcibly conducted and continued their assault, obstruction, harassment, intimidation, humiliation, and embarrassment of plaintiff in an open public place crowded with innocent 27 people seeking postal service, stopping plaintiff in his business. VII Ronald Reagan-2784

That from 1972 forward, defendants, and each of them, and with others, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, to suppress 32 and wrongfully withhold from law enforcement plaintiff's new

lifesaving law enforcement technologies by illegally assaulting and obstructing plaintiff, and depriving plaintiff of privileges and immunities guaranteed to plaintiff by I, IV, VI, VII, XIV Amendmts.

#### VIII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law.

#### IX

Ey reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

X

MHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, to be proved at trial, and such other relief as deemed just and proper by Court.

#### FIFTEENTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2):; Title 28 USC \$1343, (\$1346(b); 42 USC \$1981 et seq.; Constitution Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein complained of, loss of privileges/immunities under color of law.

Ronald Reagan-2785

III

Plaintiff is macitizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV

plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

On or about September 21 and 27, 1973, defendants STATE OF

CALIFORNIA, CALIFORNIA STATE POLICE, CHIEF GUY OATES, and others, without cause or provocation,

(caused STATE POLICEagents and employees to stalk, track and "dog"

plaintiff, on foot and in car, away from State property. Under

color of authority and pretense of law, said defendants prevented

plaintiff from freely exercising plaintiff's rights of due process

of law, lawful pursuit of business activities, free from fear or

intimidation or worrying as to just when defendants' uniformed

and gun-carrying officers would assault and injure plaintiff

severely in his body or mind, or inflicting other losses of rights.

VI

That from 1972 forward, defendants, and each of them, and with others, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting plaintiff, denying plaintiff priviliges and immunities illegally.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law.

Ronald Reagan-2786

VIII

- 35 -

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused

plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, to be proved at trial, and such other relief deemed just and proper by Court.

## SIXTEENTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 23 USC \$1343, (\$1346(b); 42 USC \$1981 et seq; Constitutional Amendment XIV.

ΙI

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein complained of for loss of privileges and immunities under color of law.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars; controversies to which the United States is a party (Const. Art.III Sec.2).

ΙV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THEOUGH ONE HUNDRED, and therefore sues these defendants, and each of the, by such fictitious names for damages caused and proximately caused to plaintiff.

## vRonald Reagan-2787

On orabout September 30, 1972, defendant FEDERAL BUREAU OF

INVESTIGATION, agents and employees, under color of authroity and
without cause or provocation,
pretense of law,/wrongfully, unlawfully, intentionally, and violently assaulted plaintiff with deadly weapons on private business

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property. Defendants, and each of them, sent FDI agents and employees to willfully, unlawfully and violently use force on plaintiff, or other malicious, wanton, willful or reckless disregard for plaintiff's rights. Defendants' agents and employees trespassed on business property and prevented plaintiff from leaving building. Defendants' agents and employees sat in the car for some time, assaulting plaintiff, humiliating, outraging and embarrassing plaintiff, and prevented plaintiff from exercising his privileges and immunities to conduct his lawful business activities

VI

That in 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with
others, to suppress and wrongfully withhold from law enforcement
plaintiff's new lifesaving firearms and related technologies by
illegally assaulting plaintiff.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law.

## VIII

Ey reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274. Ronald Reagan-2788

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WHEREFORE, plaintiff demands judgment against defendants,

and each of them, compensatory and punitive damages, to be proved at trial, and such other relief deemed proper and just by Court.

## SEVENTEENTH CAUSE OF ACTION

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 USC \$1343, \$1346(b); 42 USC \$1981 et seq.; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action complained of herein for loss of privileges and immunities under color of law.

III

Plaintiff is a citizenof the United States, and the amount in controversy exceeds ten thousand dollars; U.S. a party.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff

On or about October 4, 1972, defendant FEDERAL BUREAU OF INVESTIGATION agents and employees, "including one "TOMMY RAY", without cause or provocation, under color of authority and pretense of law, /harassed, abused, intimidated, embarrassed, humiliated, restrained, and otherwise obstructed and interfered with plaintiff in the U.S. Post Office, 3th and I Streets, Sacramento, and stopping plaintiff's business. Ronald Reagan-2789

Plaintiff was obstructed from leaving the Post Office as he wished by said two (2) agents and employees of defendants FBI, L. PATRICK GRAY DIRECTOR, acting under color of authority and pretense of law. Plaintiff was fearful and apprehansive about being attacked and "jumped" by two (2) armed men. Plaintiff demanded that said defendants, their agents and employees, and

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each of them, submit all questions to plaintiff in writing and addressed to plaintiff's attorney. Said defendants refused and forcibly conducted and continued their assault, obstruction, harassment, intimidation, humiliation, and embarrassment of plaintiff in an open public place crowded with innocent people, and deprived plaintiff privilege and immunity to uninterrupted lawful business.

#### VII

When plaintiff managed to get out of the Post Office, defendant's FBI agent "TOMMY RAY" stalked and "dogged" plaintiff down the street to City Hall, up the stairs and into the City Hall building. FBI agent "RAY" refused to not follow plaintiff.

#### VIII

That from 1972 forward, defendants, and each of them, and 14 with others, knowingly and willfully organized and caused to be 15 prganized conspiracy and agreement among themselves, to suppress 16 and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting and obstructing plaintiff, under color and pretense of authority.

#### IX

That defendants, and each of them, did the acts and things  $^{21}$  herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law, interferring with plaintiff's privileges and immunities. Ronald Reagan-2790

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental an-29 guish and physical pain, and has been injured in mind and body 30 and earning capacity, the nature and extent of which shall be 31 proved at trial, and as incorporated herein under DAMAGES from page 274.

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WHEREFORE, plaintiff demands judgement against defendants, and each of them, compensatory and punitive damages, to be proved at trial, and such other relief deemed just and proper by the Court.

## EIGHTEENTH! CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 23 USC \$1343 \$1346(b); 42 USC \$1981 se seq.; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein complaines of for loss of privileges and immunities under color of authority.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars; U.S. a party.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff. Ronald Reagan-2791

On or about October 4, 1972, defendants F3I, JOHN REED AGENT IN CHARGE, L. PATRICK GRAY DIRECTOR, agents and employees, under without cause or provocation, color of authority and pretense of law, /retaliated against plaintiff for plaintiff's insistance that the FBI immediately stop harassment and abuse of Plaintiff BROWSON. FDI AGENT IN CHARGE JOHN REED and other agents and employees forcibly, violently, loudly, wrongfully, unlawfully, maliciously and wantonly, yelling, "surrounded" the building in which plaintiff was conducting business with drawn handguns, rifles and walkie talkies. threatened violent force against plaintiff and trespassed on busi1 ness property and prevented plaintiff from leaving building. 2 | fendants' agents and employees sat in cars and milled around the building for some time, assaulting plaintiff, humiliating, outraging and embarrassing plaintiff, and prevented plaintiff from conducting his lawful business activities.

VI

That in 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to 10 suppress and wrongfully withhold from law enforcement plaintiff's 11 new lifesaving firearms and related technologies by illegally assaulting plaintiff.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law, and invaded plaintiff's guaranteed privileges and immunities.

VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274. Ronald Reagan-2792

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and compensatory and punitive damages, and such other relief as deemed just, proper and necessary by the Court.

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#### MINETEENTH CAUSE OF ACTION

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Plaintiff does hereby incorporate and adopt by reference, allegations set forth in JURISDICTION (page 2); Title 28 USC '31346(b); 42 USC 1931 et seq.; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein complained of for loss of privileges and immunities under color of authority

III

Plaintiff is ≥ citizen of the United States, and the amount in controversy exceeds ten thousand dollars; U.S. a party.

IV

Plaintiff does not know, the true names and capacities of de-Sendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff

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On August 27, 1976, defendant SACRAMENTO MUNICIPAL UTILITY DISTRICT (SHUD), employee JACK DEBOISE, was sent to restore earlier unlawfully and illegally discontinued service to busines property, said service having been illegally discontinued in retaliation against plaintiff for plaintiff's having filed this lawsuit before this Court. When plaintiff demanded why the service had been wrongfully discontinued when there was no outstanding charge owed to defendant SMUD, defendant SMUD's agent and emwithout cause or provocation, ployee/threatened plaintiff and started swinging his fist at plain tiff. Then defendant's employee was a witness, defendant's employee dropped his fist, stopped his swing at plaintiff, turned 30 on the illegally disconnected service, and left.

That defendants, and each of them, knowingly and willfully

Ronald Reagan-2793

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1 organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting plaintiff, and depriving him of guaranteed immunities from harm.

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That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, and under color of authority and pretense of law.

#### VTTT

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, to be proved at trial, and such relief as deemed proper and just by the Court.

### TWENTIETH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 USC 27 \$1346(b); 42 USC S1981 et seq.; Constitutional Amendment XIV. Ronald Reagan-2794

Plaintiff does hereby incorporate and adopt by reference, 29 30 Wall allegations set forth in all causes of action herein complained 31 of for loss of privileges and immunities under color of authority 32 and pretense of law, especially the TWENTY-FIRST CAUSE OF ACTION.

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Plaintiff is a citizen of the United States, and corrupt practices, Federal Election Campaign Act of 1971, as amended.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff

In July 1976, defendants STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, JR., and gubernatorial assistant MARC POCHE, wrongfully, unlawfully, intentionally, maliciously, disregarded their duty toward plaintiff when plaintiff attempted to communicate criminal Without cause or provocation, acts occurring in the State of California. / defendant MARC POCHE, in GOVERNOR BROWN's presence, to plaintiff's information and belief, threatened plaintiff in a hard ex-U.S. Marine voice: off this phone - everything will be taken care of". tiff BRONSON knew that under the color of authority and pretense of law, defendants BROWN and POCHE meant to shortly and immediately send more STATE POLICE OFFICER, AGENTS or EMPLOYEES, or others, to beat, maim, harass, assault, attempt to kill, silence, severely threaten plaintiff and his ' personal safety. Plaintiff continues to live in fear, alarm and apprehension of bodily harm at the hands of defendant STATE OF CALIFORNIA, or others, under color of authority or pretense of law, to get Def. BROWN elected President. Ronald Reagan-2795

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement 29 among themselves, and each of them, and with others, to suppress 30 and wrongfully withhold from law enforcement plaintiff's new life-31 saving firearms and related technologies by illegally assaulting 32 plaintiff, and to suppress defendant GOVERNOR EROWN's coverup of

crimes committed in California and in the BROWN ADMINISTRATION, of which plaintiff was knowledgeable, to get BROWN elected President.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, under color of authority and pretense of law.

VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and others, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, to be proved at trial, and such other relief as deemed just and proper by Court

#### TWENTY-FIRST CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 29 USC \$1343, (\$1346(b); 42 USC \$1931 et seq; Constitutional Amendment XIV.

Ronald Reagan-2796

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action complained of herein for deprivations of privileges and immunities under color of law.

III

plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUMDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff

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#### Defendants are:

- Def. STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, Jr. State Capitol, Sacramento, California.
- Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER, 555 Capitol Mall, Sacramento, California.
- Def. MARC POCHE, gubernatorial assistant, Office of the Governor, State Capitol, Sacramento, California.
- 4. Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE, CHIEF GUY R. OATES, State Capitol, Sacramento, California.
- 5. Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE OFFICER L.D. SHERWOOD (BADGE NO. 4), State Capitol, Sacramento, California
- Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE OFFICER S.W. WESTON, State Capitol, Sacramento, California.
  - Other defendants present and not known to plaintiff. Ronald Reagan-2797

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On February 11, 1977, defendants STATE OF CALIFCRNIA, GOVERN-OR EDMUND G. BROWN, JR., MARC POCHE, ATTORNEY GENERAL EVELLE J. 23 | YOUNGER, CALIFORNIA STATE POLICE CHIEF GUY R. OATES, and others, without cause or provocation, retalialiated against plaintiff for filing this lawsuit before this Court, and instituted and com-26 pleted defendant MARC POCHE's threats of bodily harm toward plain-27 tiff. Said defendants, and each of them, wrongfully, unlawfully, maliciously, and contemptuously, under color of authority and pretense of law, used defendants armed CALIFORNIA STATE POLICE OFFI-CERS L.D. SHERWOOD (BADGE NO. 4) and S.W. WESTON, and others not 31 | known to plaintiff, to deprive plaintiff and others of privileges

1 and immunities guaranteed to plaintiff as a citizen of the United 2 | States, by Amendments I, IV, V, VII, and KIV of the Constitution of 3 | the United States, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment. Defendants, and each of them, interferred with party to this Court proceeding by assaulting plaintiff and others while plaintiff lawfully attended ■ California administrative hearing at 1006 Fourth Street, Sacramento, California. Said defendants, and each of them, in contempt for 8 judicial and administrative proceedings and parties, "dogged", followed, stalked, obstructed, harassed, abused, assaulted, and 10 otherwise wrongfully pursued plaintiff and others with deadly weapons, preventing plaintiff and others from peaceful lawful assembly, presence and attendance at said administrative hearing. 14 | Plaintiff and others were deprived of their rights and not per-15 mitted to conduct business affairs before the administrative 16 hearing as plaintiff intended and as provided by law. venting of plaintiff to conduct business before the administrative 17 18 hearing occurred wrongfully under color of authority and pretense of law by defendants. 19 Ronald Reagan-2798

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The defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement amont themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies, to suppress, wrongfully silence, and wrongfully retaliate against plaintiff for filing complaint before this Court, to suppress and wrongfully cover-up GOVERNOR EROWN's wrongful cover-up of crimes committed in California and scandals in the Brown Administration of which plain-30 tiff is knowledgeable, and for other motives which shall be demonstrated at trial, by illegally assaulting and threatening plain-

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tiff. 32

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, under color of authority and pretense of law.

#### VIII

By reason of the wrongful, intentional, and malicious acts wounds and of defendants, and each of them, and others, and the/fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DANAGES from page 274.

IX

WHEREFORD, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and compensatory damages and punitive damages, and such other relief as deemed just and proper by this Court.

## TWEITTY-SECOND CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, 24 allegations set forth in JURISDICTION (page 2); 28 USC 581343, 25 | 1346(b); 42 USC \$1981 et seq; Constitutional Amendment MIV. Ronald Reagan-2799

Plaintiff does hereby incorporate and adopt by reference, 28 all allegations set forth in all causes of action complained of 29 herein for deprivations of privileges and immunities under color 30 of law.

III

Plaintiff is a citizen of the United States; amount in con-

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troversy exceeds Ten Thousand Dollars.

plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

IV

Ronald Reagan-2800

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Defendants are:

1. Def. STATE OF CALIFORNIA, CALIFORNIA ATTORNEY GENERAL EVELLE J. YOUNGER, 555 Capitol Mall, Sacramento, California.

2. Def. STATE OF CALIFORNIA, "MR. ALEXANDER, OFFICE OF THE ATTORNEY GENERAL, 555 Capitol Mall, Sacramento, California.

VI

On or about January 23, 1975, defentant agent, employee, or servant, "MR. ALEXANDER", refused to log charges of criminal acts (illegal wiretapping, etc.) committed in California, but instead, under color of authority and pretense of law, without cause or provocation, defendant agent, employee or servant wrongfully, willfully, maliciously, and negligently threatened plaintiff with bodily harm. When plaintiff calmed down and shortly called the ATTORNEY GENERAL'S OFFICE for "MR. ALEXANDER", plaintiff was advised that there was no such person in the OFFICE OF THE ATTORNEY GENERAL. Plaintiff was immediately fearful and apprehensive for his personal safety in that again defendant ATTORNEY GENERAL YOUNGER had his agents and employees out after plaintiff. As defendants intended, and each of them, plaintiff was quite ill for some days after. Defendants prevented plaintiff from filing his charges.

VII

That from 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting plaintiff Ronald Reagan-2801

VIII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore

complained of, rosing under color of authority and pretense of law, and invaled plaintifies quaranteed privileges and immunities.

By reason of the wrongful, intentional, willful and malicious acts and conspiracies of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

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WHEREFORE, plaintiff demands judgment against defendants, and each of them, the sum and costs of which shallbe proved at trial, and compensatory and punitive damages, and such other relief as deemed just and proper by the Court.

## IWENIY-THIRD CAUSE OF ACTION

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); 28 USC 55 1343, 1346(b); 42 USC 1931 et seq; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations sat forth in all causes of action complained of herein for deprivations of privileges and immunities under color 25 of law. Ronald Reagan-2802

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars.

IV

Plaintiff Toes not know the true names and capacities of de-Jendants shed heselm of John 1923 our THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such ficti-

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1 tious names for damages caused and proximately caused to plaintiff.

## Defendants are:

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- Def. CITY OF SACRAMENTO, City Hall, 915 I Street, Sacramento, California.
- 2. Def. CITY OF SACRAMENTO, SACRAMENTO POLICE DEPARTMENT, and CHIEF WILLIAM J. KINNEY, 813 Sixth St., Sacramento, California.
- 3. Def. CITY OF SACRAMENTO, SACRAMENTO POLICE DEPARTMENT, and INTELLIGENCE UNIT OFFICER SMITH, 813 6th St., Sacramento.

VI

On July 25, 1972, plaintiff filed particulars on criminal acts occurring in the CITY OF SACRAMENTO with defendant, its agent, employee or servant, POLICE OFFICER SMITH acting within the scope of his employment. Defendant SMITH deceivedplaintiff and plaintiff did believe that defendant SMITH was requiring requested information and particulars to complete official CITY OF SAC-RAMENTO POLICE DEPARTMENT forms regarding the commission of crimes. Defendant SMITH misquoted and misstated plaintiff's statements which, uncorrected, would subject plaintiff to prejudice and loss of respect in plaintiff's business activities and among plaintiff's business associates and clients. Plaintiff immediately objected and demanded correction of the prejudicial and false statements and information. Defendant's agent, employee or servant SMITH willfully, intentionally, wrongfully, and maliciously refused to correct the prejudicial and false statements and information, and defendant SMITH further refused to not publish and communicate the prejudicial and false statements and information to other law enforcement agencies and officials in California and elsewhere in the United States, first by teletype followed by written andpublished reports. Ronald Reagan-2803

VII

Defendant, or by its agents, employees or servants acting

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1 within the scope of their employment, intentionally, maliciously, 2 and willfully widely circulated and published to the law enforce-3 ment communities of the United States and California deliberately 4 misstated and misquoted and erroneous and false statements about plaintiff which defamed plaintiff's business reputation and professional regard.

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That the words spoken, written, published, circulated by defendant or its agents, employees or servants, acting within the scope of their employment, under color of authority and pretense of law, without cause or provocation, were false and prejudicial, and that prior to defendant's acts plaintiff enjoyed an excellent and knowlegeable reputation in the firearms field and related technologies. Defendant's acts caused plaintiff to be deprived by the law enforcement community the benefits of plaintiff's firearms ability/ plaintiff's United States Patent No. 3,543,428, "Rifle Forestock", and "ANCHOR INTERNATIONAL WEAPONS TRAINING FIRING MANUAL AND BRONSON STRINGFIRE METHOD", plaintiff's 1972 copyright property. Ronald Reagan-2804

XI

That defendant, contriving and intending to injure plaintiff and deprive him of the respect, confidence and esteem peculiarly essential to plaintiff's profession and business, and contriving and intending to deprive plaintiff of his good business name, reputation and the esteem of his business associates and clients, and to bring plaintiff into disastrous scandal, ridicule, and professional disrepute, before his clients, business associates, professional associates, friends, neighbors, acquaintances, and the public in general, and did hold plaintiff up to public scorn, contempt, ridicule and disgrace, on or about July 25, 1972 forward, by the false, scandalous, defatory libel, and wrongfully 32 published and circulated statements and information.

#### VIII

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally libeling and slandering plaintiff.

IX

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, under color of authority and pretense of law.

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and others, plaintiff has been greatly injured in his good business name, fame and reputation, in the conduct and execution of his lawful business activities, in his standing in the community wherein plaintiff conducts his business, and in the high regard, respect, confidence and esteem he has hitherto enjoyed among his business associates and members of the law enforcement community and elsewhere,

XI

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and with others, and the libel and slander thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

Ronald Reagan-2805 XII

WHEREFORE, plaintiff demands judgment against the defendants. compensatory and punitive damages, as shall be proved at trial.

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## TWENTY-FOURTH CAUSE OF ACTION

I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly \$5:1982,1983,1985,1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or useage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

Ronald Reagan-2806 III-A

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

Plaintiff is a citizen of the United States and the UNITED STATES is a party to this controversy.

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

#### Defendants are:

- Def. FEDERAL BUREAU OF INVESTIGATION (FBI), headquarters in Washington, D.C.
- Def. FEBERAL BUREAU OF INVESTIGATION, FBI DIRECTOR WILLIAM RUCKELSCHAUS, Washington, D.C.
  - Def. UNITED STATES OF AMERICA.

#### VIII

On May 22, 1973, defendant, its agent, employee or servant FBI DIRECTOR WILLIAM J. RUCKELSHAUS, under color of authority and pretense of law, intentionally, willfully, and maliciously sent a false and prejudicial letter to New York United States Senator James L. Buckley which subjected plaintiff to prejudice and loss of respect in the eyes of a fellow Yale Man.

# Ronald Reagan-2807

The defendant, contriving and intending to injure plaintiff and deprive him of the respect, confidence and esteem peculiarly essential to plaintiff's business profession and expertise, and contriving and intending to deprive plaintiff of his good busi-30 ness name, reputation and the esteem of his business associates 31 and clients, and to bring plaintiff into disastrous scandal, ridi-32 cule, and professional disrepute, before his clients, professional

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and business associates, friends, neighbors, acquaintances, and the public in general, and to hold plaintiff up to public scorn, contempt, ridicule and disgrace, did heretofore, on or about the day of May 22, 1973, falsely and wrongfully publish and circulate of and concerning the plaintiff, the following false, scandalous and defamatory libel:

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- "Mr. Bronson is a self-described designer-inventor who (1)claims to have developed a weapons training and firing system which will vastly improve the user's accuracy."
- "Mr. Bronson's manual has been reviewed by the FBI (2) Academy firearms staff, and was found to contain no additional knowledge or technology to that already in use in our firearms program."
- (3) "For some unknown reason, he (plaintiff BRONSON) selected former Acting Director Gray as one of the individuals most responsible for law enforcement's lack of interest in his (BRON-SON) system."
- "In recent weeks, Mr. Bronson has made two telephone calls to FBI Headquarters, Washington, D.C. On both occasions, Mr. Bronson terminated his telephone calls with abusive and obsome remarks when he was told the FBI had made no effort to sup-Ronald Reagan-2808 press his technology."

The foregoing was meant and intended to convey that plaintiff 24 BRONSON was to be suppressed and deprived the benefits of plaintiff's firearms ability and expertise, as embodied in United 26 States Patent No. 3,543,428, "Rifle Porestock", and plaintiff's 27 1972 copyright "ANCHOR INTERNATIONAL WEAPONS TRAINING FIRING MANUAL AND BRONSON STRINGFIRE METHOD", by the law enforcement community and starting with defendant FBI, and to hold plaintiff in 30 contempt in the eyes of his business associates and clients he worked with in E professional capacity. The foregoing wrongful 32 act was meant to direct attention to plaintiff away from defendant(s)'s wrongful, malicious acts under color of authority or law.

X

That the words spoken, written, published, circulated by defendant or its agents, employees or servants, acting within the scope of their employment, under color of authority and pretense of law, without cause or provocation, were false and prejudicial, and that prior to defendant's acts plaintiff enjoyed an excellent and knowlegeable reputation in the firearms field and related technologies.

XI

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from lawenforcement plaintiff's new lifesaving firearms and related technologies by illegally libeling and slandering plaintiff.

XII

That defendants, and each of them, did the acts, conspiracies and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, under color of authority and pretense of law.

XIII

By reason of the wrongful, intentional, and malicious acts 24 of defendants, and each of them, and with others, plaintiff has been greatly injured in his good business name, fame and reputa-26 tion, in the conduct and execution of his lawful business activi-27 ties, in his standing in the community wherein plaintiff conducts 28 his business, and in the high regard, respect, confidence and 29 esteem he has hitherto enjoyed among his business and professional associates and members of the law enforcement and sport shooting 31 communities and elsewhere. Ronald Reagan-2809

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XIV

By reason of the wrongful, intentional, and malicious acts 3 of defendants, and each of them, and with others, and the libel and slander thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

WHEREFORE, plaintiff demands judgment against the defendants, and each of them, the nature, extent, sum and costs of which 12 shall be proved at trial, and for compensatory and punitive dama-13 ges, and for such other relief as is deemed just and proper by this Court.

## TWENTY-FIFTH CAUSE OF ACTION

Plaintiff does hereby incorporate and adopt by reference, 18 all allegations set forth in JURISDICTION (page 2); Title 28 U.S.C. 19 | \$\$1343,1346(b); 42 U.S.C. \$1981 et seq.; Constitution Amend. XIV.

II

Plaintiff does hereby incorporate and adopt by reference, 22 all allegations set forth in all causes of action, herein, herein-23 before and hereinafter complained of for loss of privileges and immunities under color of authority and pretense of law.

III

Plaintiff is a citizen of the United States, the amount in controversy exceeds Ten Thousand Dollars, and the UNITED STATES is a party. Ronald Reagan-2810

IV

Plaintiff does not know the true names and Capacities of de-31 fendants sued herein as JUHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such ficti-

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tious names for damages caused and proximately caused to plaintiff.

#### Defendants are:

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- 1. Def. UNITED STATES ARMY, headquarters The Pentagon, Washington, D.C., for the Aberdeen Proving Grounds, Aberdeen, Maryland, and elsewhere.
- 2. Def. WINCHESTER-WESTERN DIVISION of the OLIN CORPORATION, Stamford, Connecticut.
- 3. Def. REMINGTON ARMS DIVISION of the DUPONT DE NEMOURS CORPORATION, Wilmington, Delaware.
- 4. Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTORS L.P. GRAY WILLIAM RUCKELSHAUS, CLARENCE M. KELLEY, headquarters Washington, 12 D.C.
- 5. Def. NATIONAL RIFLE ASSOCIATION of AMERICA, 1600 Rhode 14 Island Avenue, N.W., Washington, D.C.
- 6. Def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION of the 16 UNITED STATES DEPARTMENT OF JUSTICE, headquarters Washington, D.C.
- 7. Def. INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE, INC., 17 13 headquarters 11 Firstfield Road, Gaithersburg, Maryland.
- 8. Def. NATIONAL SHERIFFS ASSOCIATION, 1250 Connecticut Ave-20 nue, N.W., Washington, D.C., headquarters.
- 9. Defs. NIXON ADMINISTRATION WHITE HOUSE OFFICIALS, 1600 21 22 Pennsylvania Avenue, Washington, D.C.
  - 10. Def. COLT INDUSTRIES, INC., headquarters New York City.
- 11. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J. 24
- 25 YOUNGER and GOVERNOR RONALD REAGAN, State Capitol, Sacramento, CA.
- 12. Def. LOS ANGELES COUNTY, SHERIFF PETER PITCHESS, 211" 26
- 27 West Temple, Los Angeles, California 90012.
- 13. Def. SACRAMENTO COUNTY, SHERIFF DUANE LOWE, DISTRICT AT\_ 28 29 TORNEY JOHN PRICE, 720 - 9th Street, Sacramento, California.
- 14. Def. CITY OF SACRAMENTO, SACRAMENTO POLICE, CHIEF WILLIAM

Ronald Reagan-2811 31 J. KINNEY,

15. Def. FEDERAL PROTECTIVE SERVICE, OFFICERS CHASTAINE, CLEMONS and SNELSON, Sacramento, California. 16. Def. STATE OF CALIFORNIA, CALIFORNIA HIGHWAY PATROL, COMMISSIONER GLENDON B. CRAIG, headquarters Sacramento, California 17. Def. STATE OF CALIFORNIA, STATE POLICE, OFFICERS WESTON and SHERWOOD, CHIEF GUY R. OATES, headquarters Sacramento, CA. 18. Def. STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, Jr., MARC POCHE, State Capitol, Sacramento, California. Def. CITY OF LOS ANGELES, LOS ANGELES POLICE DEPARTMENT, CHIEF EDWARD DAVIS, 150 North Los Angeles, Los Angeles, CA 90012. 

Ronald Reagan-2812

Beginning about 1971, and continuing to present time, defendant UNITED STATES ARMy performed incorrect testing and analysis of Plaintiff BRONSON's United States Patent No. 3,543,428, "Rifle Forestock", and related firearms technologies. Defendant ARMY refused to retest said technologies of plaintiff and correct defendant ARMY's verbal and written reports of false findings. wrongful acts and other things done by defendant ARMY are more fully set forth herein in plaintiff's 72nd through 75th causes/act relating to defendant(s), and each of them, anti-trust conspiracies and other wrongful acts.

#### VII

Beginning in and about 1971, and continuing to present, in doing the above-mentioned comspiracies, acts and things herein, hereinafter and hereinbefore complained of, defendant UNITED STATES ARMY instigated and entered into conspiracies against plaintiff, the results of which are:

- 1. That def. ARMY deliberately released said false reports of plaintiff's technologies and United States Patent to the firearms and related industries, and the public in general; that def. ARMY refused to retest and correct said false reports; that def. 22 ARMY's illegal and wrongful acts were to coverup the inferior def. 23 ARMY's weaponry in the M-16 automatic rifle, the infantry rifle of the Vietnam War.
- That in exchange for coverup of inferior federal (ARMY) weaponry, federal contracts, "add-on" contracts, and other "considerations", defendants ARMY, WINCHESTER, REMINGTON, COLT, and and THE ITHACA CORPORATION, each of them, and with others,/conspired and acted and did not permit plaintiff with his firearms and related technologies to 30 engage in or compete in interstate commerce against defendant(s) Ronald Reagan-2813 to date.

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- That in exchange for coverup of inferior def. FEDERAL BUREAU OF INVESTIGATION pistol technology, inferior def. SECRET SERVICE pistol technology, inferior def(s) NRA, IACP, and NSA pistol technologies, and for special "considerations" from the law enforcement communities and officials of the NIXON ADMINISTRATION, defendant(s) ARMY, FBI, SECRET SERVICE, NRA, IACP, NSA, LOS ANGE-LES POLICE AND SHERIFF DEPARTMENTS, SACRAMENTO POLICE AND SHERIFF DEPARTMENTS, and each of them, and with others, conspired and actor engage ed and did not permit plaintiff to compete/in interstate commerce against defendant(s); that plaintiff was removed from competition by defendant(s) conspiring and using beatings, strangulation, hand cuffing, assault, false imprisonment, false arrest, involuntary restraint, tresspass, attempted murder, sabotage of business equipment, illegal wiretap, interference with delivery of U.S. mail and other services, unlawful search and seizure, deprivation of Civil Rights under color of authority and pretense of law, and other wrongful conspiracies, acts and things herein complained of; that the said conspiratorial campaign and patterns of harassment and abuse of plaintiff were intended to and did not permit plaintiff to demonstrate that plaintiff's "STRINGFIRE" technology pro-21 tects innocent citizens from wild, random gunfire by police, as well as protecting law officers lives against felons, and to better protect citizens by allowing law officers to stop felons from wrongdoing by precise control firearms handling; that defendants, and each of them, did together refuse to comment upon, fairly evaluate, or fairly consider plaintiff"s new lifesaving law en-27 | forcement and military technologies.
- 4. That inexchange for coverup of inferior federal (ARMY) weaponry, federal contracts, "add-on" contracts, and other "con-30 siderations", defendants WINCHESTER, REMINGTON, COLT, and others, 31 suppressed competition from Plaintiff BRONSON's more superior and 32 effective and efficient "rifle forestock" in threats against

plaintiff's potential clients, business associates, and firearms manufacturers.

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- 5. That in exchange for coverup of inferior federal (ARMY) weaponry, federal contracts, "add-on" contracts, and other "considerations", defendant(s) COLT, ARMY, and others, did suppress from the American public the inferiority, inoperability, and ineffectiveness of the UNITED STATES ARMY infantry automatic rifle, the M-16, the Vietnam rifle, from investigations by the United States Congress and defendant(s) FEDERAL BUREAU OF INCESTIGATION.
- 6. That def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION, and others, wrongfully used its funding to law enforcement authority under Crime in the Streets Act of 1968 and the Omnibus Crime Bill of 1968 to blackmail defendant(s) from not using plaintiff's firearms and related technologies, by discriminating against the American law enforcement communities and conspiratorily providing wrongfully requested federal funds to law enforcement communities in California, particularly in Sacramento and Los Angeles.
- 7. That defs. WINCHESTER WESTERN/OLIN, REMINGTON ARMS/DUPONT and others, made illegal campaign contributions to Committee to Relect the President (RICHARD M. NIXON), in exchange for which officials of the NIXON WHITE HOUSE conspired and ordered plaintiff's firearms and related technologies suppressed through wrongful, malicious, and intentional use of defendant(s) FBI, FBI DIR\_ ECTORS GRAY AND RUCKELSHAUS AND KELLEY, THE SECRET SERVICE, LEAA, and others, in illegal wiretapping and other wrongful acts and things herein complained of; that plaintiff was the victim of political blackmail and federal funding blackmail.'
- 8. That defendant(s) each in his own way conspired through political and funding blackmail to effect def. STATE OF CALIFORNIA, 30 ATTORNEY GENERAL YOUNGER, GOVERNOR REAGAN and GOVERNOR EROWN, and others, wrongful suppression of Plaintiff BRONSON and his firearms and related technologies. Ronald Reagan-2815

That defendant(s) each in his own way conspired through 9. 2 political and funding blackmail to effect defendant GOVERNOR ED-MUND G. BROWN, Jr., wrongful suppression and abuse of plaintiff 4 by contributing to def. GOVERNOR BROWN's 1974 campaign for governor of California, 1976 campaign for President of the United States and 1978 campaign for reelection to governor.

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10. That defendants, and each of them, conspired and did have def. FEDERAL PROTECTIVE SERVICE OFFICERS attack, beat, handcuff, strangle, illegally search, seize, imprison, arrest, etc., plaintiff on August 22, 1975, without cause or provocation, under color of authority and pretense of law, as more fully described in plaintiff's FIRST through THIRD CAUSES OF ACTION.

That defendants, and each of them, conspired and did have def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE, OFFICERS SHERWOOD AND WESTON, assault and threaten plaintiff with deadly weapons on February 11, 1977, in retaliation for filing this lawsuit, in retaliation from def. GOV. BROWN, and others, for plaintiff's efforts to expose the criminal coverup by GOV. BROWN of criminal acts in the Brown Administration, and as political payoff by def. GOVERNOR BROWN to defendant(s) in law enforcement, and others, in which defendants, and each of them conspired to support and contribute to the Brown Election Campaigns in return for GOV. BROWN's continuing the assaults and harassments of plain-Ronald Reagan-2816 tiff.

- 12. That defendants NATIONAL RIFLE ASSOCIATION, INTERNATION-AL ASSOCIATION OF CHIEFS OF POLICE, NATIONAL SHERIFFS ASSOCIATION, conspired with organization members and responded to plaintiff unanimously in the negative or with obsenities, and dismissed plaintiff's technologies without testing.
- 13. That defendants firearms manufacturers threatened to put local retail gun dealers out of business by withdrawing firearms "lines" if plaintiff's technologies were implemented or licensed.

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VIII

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The defendants, and each of them, conspired, contrived and intended to injure plaintiff and deprive his of the respect, confidence and esteem peculiarly essential to plaintiff's business profession and expertise, and said defendants conspired, contrived and intended to deprive plaintiff of the privileges and immunities guaranteed to plaintiff under Amendments I, IV, V, VI, VII; and XIV of the United States Constitution, and did deprive plaintiff of his good business name, reputation and esteem of his business associates and clients, and brought plaintiff into disastrous scandal, ridicule, and professional disrepute before his clients, professional and business associates, friends, neighbors, acquaintances, and the public in general, and held plaintiff up to public scorn, and did restrain plaintiff from being able to compete in interstate commerce and compete in the manufacture of, training in, and other things, related to firearms and other technologies, and did wrongfully publish and circulate false information regardplaintiff and his technologies.

IX

That from 1971 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracies and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement and the military plaintiff's new lifesaving firearms and related technologies by illegally conspiring against and suppressing plaintiff. Ronald Reagan-2817

That defendants, and each of them, did the conspiracies, acts 29 and things herein, hereinafter and hereinbefore complained of, 30 and in furtherance of, the conspiracy and agreement herein alleged and complained of, by defendant(s), its agents, employees or servants, acting within the scope of their employment, under color of authority and pretense of law, without cause or provocation, and intentionally invaded plaintiff's guaranteed protections, privileges and immunities under Amendments I, IV, V, VI, VII, and XIV of the United States Constitution.

XI

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement, NATO and the U.S. military plaintiff's new lifesaving firearms and related technologies by illegally conspiring against and assaulting plaintiff.

XII

By reason of the wronful, intentional, and malicious acts of defendant(s), plaintiff has been greatly injured in his good business name, fame and reputation, in the conduct and execution of his lawful business activities, in his standing in the community wherein plaintiff conducts his business, and in the high regard, respect, confidence and esteem he has hitherto enjoyed among his business and professional associates and members of the law enforcament, military and sport shooting communities, and elsewhere.

XIII

By reason of the wrongful, intentional, and malicious acts of defendant(s), and the wounds and fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial.

VIX

wherefore, plaintiff demands judgment against the defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, for compensatory and punitive damages and incorporated from page 274, and for such other relief as is deemed just and proper by this Court.

- 67 -

# TWENTY-SIXTH CAUSE OF ACTION

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly \$5 1982,1983,1935,1936, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.; Crime in the Streets Act and Omnibus Crime Bill, both of 1968; Federal Election Campaign Law of 1971.

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Further, jurisdiction of the Court is invoked under Title

28, United States Code, Secs. 1331 and 1343, this being a suit in
equity authorized by law; Title 42, United States Code, Sec. 1983,
to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation
under color of statute, ordinance, regulation, custom or useage
of a State of rights, privileges, and immunities secured by the
Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those
secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States
Constitution. The matter in controversy, exclusive of interest
and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III -A

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff Ronald Reagan-2819

of the privileges and immunities guaranteed to plaintiff by Amendments I, IV, V. VI. VII, and KIV of the Constitution of the United States.

## III - B

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 23, USC, Sections 1343 and 1346(b); Title 42, USC, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and XIV to the United States Constitution.

### III - C

Plaintiff does hereby incomporate and adopt by reference, all allegations set forth in all causes of action herein, hereinafter and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pratonse of law.

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IV

Plaintiff BRONSON is a citizen of the United States, the UNITED STATES IS a party, and plaintiff incorporates herein all causes of action hereinafter and hereinbefore complained of.

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff

VI

#### Defendants are:

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- 1. Def. UNITED STATES DEPARTMENT OF JUSTICE, UNITED STATES ATTORNEY DWAYNE KEYES, 650 Capitol Mall, Sacramento, California.
- Def. UNITED STATES DEPARTMENT OF JUSTICE, UNITED STATES (ASSISTANT) ATTORNEY DONALD HELLER, 1220 H Street, Sacramento, CA. Ronald Reagan-2821

Following the August 22, 1975, beating, strangulation, handcuffing, false imprisonment, illegal search and seizure, etc., of plaintiff wrongfully by defendant FEDERAL PROTECTIVE SERVICE, its agents, employees, or servants, and more fully set forth in FIRST THROUGH THIRD CAUSES OF ACTION herein, acting within scope of employment, under color of authority and pretense of law, without cause or provocation, Plaintiff BRONSON immediately contacted the Office of UNITED STATES ATTORNEY DWAYNE KEYES to file criminal charges against said defendants, and each of them, in plaintiff's 28 lawful capacity of "complaining witness" for the United States of 29 America. That beginning with plaintiff's August 22, 1975, beat-30 ling, etc., by defendant FPS, its agents, employees or servants, 31 extending through 1976, Plaintiff BRONSON's communications to 32 ASSISTANT U.S. ATTORNEY HELLER for U.S. ATTORNEY DWAYNE KEYES

were repeatedly refused by ASST. U.S. ATTORNEY HELLER in conspiracy with defendants, and each of them. ASST.U.S. ATTORNEY HELLER repeatedly refused to receive complaint and filing of criminal charges against defendant FPS, its, agents, employees, or servants, by plaintiff, stating that plaintiff had to be represented by "private attorney". Continuing the UNITED STATES conspiracy against plaintiff, ASST. U.S. ATTORNEY HELLER continued to refuse to permit filing of complaint and criminal charges against said defendant(s) by plaintiff even after plaintiff BRONSON identified himself as in propria persona exercising plaintiff's right of "complaining witness" for the United States of America and did not need a "private Attorney" to do so. Plaintiff had been instructed by federal official that there is no place for "private attorney" in the United States Attorney's complaints and actions for criminal wrongdoing. ASST. U.S. ATTORNEY HELLER wrongfully, maliciously, negligently, wantonly, conspiringly, denied Plaintiff BRONSON protections, privileges, and immunities guaranteed to plaintiff under Amendments I, IV, V, VI, VII, and XIV of the United States Constitution, and particularly the Equal Protection and Due Process of Law Clauses of the Fourteenth Amendment. Plaintiff never achieved filing of criminal complaint because of HELLER's refusals to perform his duty Ronald Reagan-2822

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VIII

That from 1975 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by 29 conspiring and covering up defendant FPS beating of plaintiff.

IX

That defendants, and each of them, did the acts and things herein alleged pursuant to, and infurtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law, and invaded plaintiff's guaranteed privileges and immunities.

X

By reason of the wrongful, intentional, willful and malicious acts and conspiracies of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XI

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and compensatory and pumitive damages, and such other relief as deemed just and proper by the Court.

## TWENTY-SEVENTH CAUSE OF ACTION

plaintiff does hereby incorporate and adopt by reference,
all allegations set forth in JURISDICTION (page 2); Title 28 USC
ss1343,1346(b); 42 USC s1981 et seq.; Constitutional Amendment XIV

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plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinbefore and hereinafter complained of, for loss of privileges and immunities under color of authority and pretense of law.

III

Plaintiff is a citizen of the United States, the amount in controversy exceeds Ten Thousand Dollars, and the UNITED STATES additionally is a party; jurisdiction arises/under Federal Election Campaign Law of 1971, as amended. Ronald Reagan-2823

Plaintiff does not know the true names and capacities of de-

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fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

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#### Defendants are:

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- 1. Def. UNITED STATES, LAW ENFORCEMENT ASSISTANCE ADMINIS-TRATION, headquarters Washington, D.C.
- Def. STATE OF CALICORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER through the Office of Criminal Justice Planning, Sacramen.
- Def. STATE OF CALIFORNIA, CALIFORNIA HIGHWAY PATROL, headquarters Sacramento.
- 4. Def. COUNTY OF SACRAMENTO, SHERIFFS DEPARTMENT, SHERIFF DUANE LOWE, 711 @ Street, Sacramento, California.
- Def. CITY OF SACRAMENTO, SACRAMENTO POLICE DEPARTMENT, CHIEF WILLIAM J. KINNEY, 813 - 6th Street, Sacramento, California.
- Def. LOS ANGELES COUNTY, SHERIFFS DEPARTMENT, SHERIFF PETER PITCHESS, 211 West Temple, Los Angeles, California.
- Def. CITY OF LOS ANGELES, LOS ANGELES POLICE DEPARTMENT, CHIEF EDWARD DAVIS, 150 North Los Angeles Street, Los Angeles, California 90012.
- Def. CITY OF LOS ANGELES, MAYOR THOMAS BRADLEY, City Hall, 21 200 North Spring Street, Los Angeles, California, 90012. Ronald Reagan-2824

On or about 1972, defendants, and each of them, conspired with def. LEAA, its agents, employees, or servants, and others, and did accept federal law enforcement funding assistance, fun-27 | neled through the California Office of Criminal Justice Planning 28 and elsewhere, for not adopting, implementing or training in 29 | Plaintiff's United States Patent No. 3,543,428, "Rifle Forestock", 30 and "ANCHOR INTERNATIONAL WEAPONS TRAINING FIRING MANUAL AND 31 BRONSON STRINGFIRE METHOD", and other related technologies. 32 fendants, and each of them, accepted the federal law enforcement

1 funding in the finance of this conspiracy, discriminating against 2 other law enforcement communities and desperate needs, and for 3 the political reasons, blackmail, advancement, funding and support 4 of ATTORNEY GENERAL YOUNGER'S campaigns, LAPD CHIEF DAVIS'S campaing, GOVERNOR RONALD REAGAN'S campaign, MAYOR THOMAS BRADLEY'S campaigns (former policeman), GOVERNOR BROWN's presidential and reelection campaigns, and others. Defendant(s) maliciously, wrongfully and willfully did these acts and things herein complained of to deprive plaintiff of his Patent and STRINGFIRE properties. Defendant(s) at the same time breached their duty to fellow officers and placed their lives unnecessarily in danger and traitorously spent the lives of several hundred police officers in California in defendant(s) willful, malicious and wanton suppression of plaintiff and his technologies. Defendants, and each of them, sent back training manuals without comment, fair evaluation or fair consideration of the new lifesaving weapons technologies.

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## VII

In doing the wrongful conspiracies, acts and things abovementioned, def. MAYOR ERADLEY ignored plaintiff's May 15, 1975, and prior pleas for MAYOR BRADLEY investigation in the scope of his employment of the conspiracy and federal funding blackmail involving LAPD CHIEF EDWARD DAVIS. Plaintiff is not to write, communicate, with any one in the CITY OF LOS ANGELES government by order of MAYOR BRADLEY, as plaintiff was repeatedly advised.

## VIII

Beginning in or about 1972, def. LEAA, its agents, employees or servants, conspired to restrain and suppress plaintiff's fire-28 arms and related technologies and described in sub-paragraphs VI Ronald Reagan-2825 and VII above, and did:

Eribe, restrain, suppress and otherwise keep plaintiff 31 out of the firearms industry and weapons/sports training fields, 32 by use of "discriminatory" and unfair and unlawful federal funding.

(2) Bribe, restrain, suppress and otherwise keep plaintiff out of the law enforcement and military weapons training field.

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- (3) Payoff to defs. WINCHESTER, REMINGTON, and COLT, and others, directly and directly, for defendant(s) illegal election campaign contributions to RICHARD M. NIXON and others, by wrongfully, willfully and maliciously eliminating competition to defs. WINCHESTER, REMINGTON, COLT, and others, represented in Plaintiff BRONSON and his firearms and related technologies.
- (4) Material assist in the extended coverup of the inferior, ineffective, inefficient, inoperative ARMY M-16 infantry rifle which caused the unnecessary loss of thousands of lives of American servicemen and lost the Vietnam War for America.
- Bribe the California law enforcement community with federal funding monies and "considerations" and other acts and things herein complained of, in return for certain California law enforcement community defendant(s) acting to not adopt, implement or train in plaintiff's firearms and related technologies.
  - (6) Other acts and things which shall be proved at trial.

IX

That from 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by conspiring and covering up defendant(s) wrongdoing through federal funding blackmail, bribes, payoffs, etc., which shall be proved Ronald Reagan-2826 at trial.

X

That defendants, and each of them, did the acts and things 30 herein alleged pursuant to, and in furtherance of, the conspiracy 31 and agreement herein alleged, and hereinafter and ; hereinbefore 32 |complained of, acting under color of authority and pretense of

law, and invaded plaintiff's guaranteed privileges and immunities under Equal Protection and Due Process Clauses of Amendment XIV.

XI

By reason of the wrongful, intentional, willful and malicious acts and conspiracies of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XII

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and compensatory and punitive damages, and such other relief as deemed just and proper by the Court.

## TWENTY-EIGHTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 of the United States Code, Sections 1343,1346(b); Title 42, United States Code, Section 1981 et seq.; Fourteenth Amendment of the Constitution of the United States; and Public Utilities Act.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinafter and hereinbefore complained of for loss of privileges and immunities under color of authority and pretense of law.

III

Plaintiff is a citizen of the United States, the UNITED STATES is a party, and the amount in controversy exceeds, exclusive of interest and costs, Ten Thousand Dollars.

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fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

Plaintiff does not know the true names and capacities of de-

#### Defendants are:

- Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTORS L.P. GRAY, WILLIAM RUCKELSHAUS, CLARENCE M. KELLEY, headquarters in Washington, D.C.
- 2. Def. UNITED STATES SECRET SERVICE, headquarters, Washington, D.C.
- 3. Defs. NIXON ADMINISTRATION WHITE HOUSE OFFICIALS, 1600 Pennsylvania Avenue, N.W., Washington, D.C.
- Def. WESTERN UNION TELEGRAPH COMPANY, headquarters at 60 Hudson Street, New York, NY 10013; Baltimore Area Office, 108 East Baltimore Street, Baltimore, MD 21202; Hagerstown, Md branch office at 31 East Antietam Street, Hagerstown, MD 21740. Ronald Reagan-2828

On or about April 28, 1973, plaintiff paid for and sent a telegraphic message, followed by letter, to defendant EXECUTIVE OFFICES of the NIXON ADMINISTRATION. Plaintiff demanded that the wrongful, malicious, willful, and unlawfull suppressions, harassment, abuse, illegal wiretapping, etc., of plaintiff and his technologies by defendant(s), its agents, employees or servants, acting under color of authority and pretense of law, stop immediately. Further, plaintiff demanded that defendant UNITED STATES, its agents, employees or servants coverup of defendant(s) wrongdoings and wrongful acts toward plaintiff stop immediately. Further, plaintiff demanded immediate retraction of defendant UNITED STATES, 31 U.S. DEPARTMENT OF JUSTICE, ASST. ATTORNEY GENERAL HENRY E. PETER-32 SEN, October 20, 1972 letter which was false and a discrediting

of plaintiff and plaintiff's firearms and related technologies in malicious, wanton and willful act by PERERSEN in the scope of his employment under the control of defendant UNITED STATES, its agents, employees or servants.

VII

Immediately thereafter, plaintiff was informed, and so relies on, by def. WESTERN UNION, its agents, employees or servants, that def. WESTERN UNION routed plaintiff's telegraphic message through defendant's Baltimore (MD) Area Office then to its local office in Hagerstown, Maryland. Def. WESTERN UNION, its agents, employees or servants, later denied this routing of plaintiff's message, instead stating to plaintiff that def. WESTERN UNION never received plaintiff's telegraphic message in Baltimore directly from Sacramento, California. Further, def. WESTERN UNION stated it had no record of plaintiff's telegraphic message. Def. WESTERN UNION, its agents, employees or servants, conspired and collaborated with defendant(s) FBI, SECRET SERVICE, NIXON ADMINISTRATION OFFI-CIALS, and others, to suppress and destroy plaintiff's telegraphic message in violation of the regulations of the Public Utilities Act. Def. WESTERN UNION conspired to and did assist defendant(s) FBI, SECRET SERVICE, NIXON ADMINISTRATION OFFICIALS, and others, in covering up their illegal acts depriving plaintiff of his guaranteed privileges, immunities and protections of Amendments I, IV, V, VI, VII, and XIV of the United States Constitution. Plaintiff does not know what happened to plaintiff's telegraphic message, and plaintiff continued, and continues to present, to be abused, harassed, illegally wiretapped, etc., complained of hereinbefore and hereinafter, by defendant UNITED STATES, its agents, Ronald Reagan-2829 employees, or servants.

VIII

That from 1973 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspir-

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acy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense law, and invaded plaintiff's guaranteed privileges and immunities under Equal Protection and Due Process Clauses of Amendment XIV of the United States Constitution, and the regulations of the Public Utility Act.

IX

By reason of the wrongful, intentional, willful and malicious acts and conspiracies of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

X

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and compensatory and punitive damages and such other relief as deemed just and proper by the Court.

### TWENTY-NINTH CAUSE OF ACTION

I.

Plaintiff does hereby ; incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28, United States Code, Sections 1343, 1346(b); 42 USC \$1981 et seq.; and Fourteenth Amendment to the Constitution of the United States. Ronald Reagan-2830

Plaintiff does hereby incorporate and adopt by reference, all 28 | allegations set forth in all causes of action herein, hereinafter 29 and hereinbefore complained of for loss of privileges and immuni-36 ties under color of authority and pretense of law.

III

plaintiff is a citizen and the UNITED STATES IS A PARTY.

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Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

#### Defendants are:

- Def. UNITED STATES OF AMERICA, U.S. DEPARTMENT OF JUS-TICE, ASSISTANT UNITED STATES ATTORNEY GENERAL HENRY E. PETERSEN, headquarters Washington, D.C.
- 2. Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTOR L. PATRICK GRAY, headquarters Washington, D.C.

#### VI

On or about October 20, 1972, defendant, its agent, employee or servant ASSISTANT UNITED STATES ATTORNEY GENERAL HENRY E. PE-TERSEN, under color of authority and pretense of law, intentionally, willfully, and maliciously sent = false and prejudicial letter to California United States Senator Alan Cranston which falsely discredited plaintiff and subjected plaintiff to prejudice and loss of respect in the eyes of Senator Cranston. Ronald Reagan-2831

The defendant, contriving and intending to injure plaintiff and deprive him of the respect, confidence and esteem peculiarly essential to plaintiff's business profession and expertise, and contriving and intending to deprive plaintiff of his good business name, reputation and the esteem of his business and professional associates and clients, and to bring plaintiff into disastrous scandal, ridicule, and professional disrepute, before his clients, professional and business associates, friends, neighbors, acquaint ances, and the public in general, and to hold plaintiff up to public scorn, contempt, ridicule and disgrace, did heretofore, on or 32 about the day of October 20, 1972, falsely and wrongfully publish

and circulate of and concerning the plaintiff, the false, scandalous and defamatory libel.

Plaintiff herein requests the indulgence of the Court and petitions that plaintiff be allowed to amend this sub-parapraph VII of plaintiff's TWENTY-NINTH CAUSE OF ACTION at a later date to include the false, scandalous and defamatory libel in letter not in plaintiff's possession, but in the possession of United States Senator Alan Cranston and the United States Department of Justice.

The foregoing described letter was meant and intended to convey that plaintiff BRONSON was to be suppressed and deprived the benefits of plaintiff's firearms ability and expertise, as embodied in United States Patent No. 3,543,428, "Rifle Forestock", and plaintiff's 1972 copyright "ANCHOR INTERNATIONAL WEAPONS TRAINING FIRING MANUAL AND BRONSON STRINGFIRE METHOD", by the law enforcement community and starting with defendant FBI, and to hold plaintiff in contempt in the eyes of his business and professional associates and clients he worked with in a professional capacity. Further, the foregoing described letter was meant to turn the eyes of the inquirer from defendant(s) and their wrongful acts to the direction of plaintiff.

## VIII

That the words spoken, written, published, circulated by defendant or its agents, employees or servants, acting within the scope of their employment, under color of authority and pretense of law, without cause or provocation, were false and prejudicial, and that prior to defendant's acts plaintiff enjoyed an excellent and knowlegeable reputation in the firearms field and related Ronald Reagan-2832 technologies.

IX

That defendants, and each of them, knowingly and willfully 32 organized and caused to be organized conspiracy and agreement

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among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally libeling and slandering, discrediting plaintiff.

X

That defendants, and each of them, did the acts, conspiracies and things herein alleged pursuant to, and in furtherance
of, the conspiracy and agreement herein alleged, and hereinafter
and hereinbefore complained of, under color of authority and pretense of law.

XI

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and with others, plaintiff has been greatly injured in his good business name, fame and reputation, in the conduct and execution of his lawful business activities, in his standing in the community wherein plaintiff conducts his business, and in the high regard, respect, confidence and esteem he has hitherto enjoyed among his business and professional associates and members of the law enforcement and sport shotting communities and elsewhere.

XII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and with others, and the libel and slander thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured inmind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274Ronald Reagan-2833

XIII

WHEREFORE, plaintiff demands judgment against the defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and compensatory and punitive damages, and for

- 81 -

such other relief as deemed just and proper by the Court.

# THIRTIETH CAUSE OF ACTION

T

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly \$5: 1982,1983,1985,1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title
28, United States Code, Secs. 1331 and 1343, this being a suit in
equity authorized by law; Title 42, United States Code, Sec. 1983,
to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation
under color of statute, ordinance, regulation, custom or useage
of a State of rights, privileges, and immunities secured by the
Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those
secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States
Constitution. The matter in controversy, exclusive of interest
and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

Ronald Reagan-2834

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

of the privileges and immunities guaranteed to plaintiff by Amendments I, TV, VI, VII, and XIV to the United States Constitution.

IV

Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars.

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff,

VI

## Defendants are:

- 1. Def. FEDERAL PROTECTIVE SERVICE (FPS) of the UNITED STATES GENERAL SERVICES ADMINISTRATION (GSA). Headquarters of the GSA are Washington, D.C. Local headquarters of the FEDERAL PROTECTIVE SERVICE (FPS) is 650 Capitol Mall, Sacramento, California.
- 2. Defs. OFFICER CLEMONS (BADGE 3327), OFFICER JAMES CHAS-TAINE, and CLARENCE SNELSON, uniformed agents and employees of the Sacramento FEDERAL PROTECTIVE SERVICE office.
- 3. Defs. OFFICER GREER and OFFICER W.W. SMITH (BADGE 30), 21 uniformed agents and employees of LUV SECURITY SERVICE, Sacramento,
- 4. Def. LUV SECURITY SERVICE, Sacramento, California, under contract to the defendant FEDERAL PROTECTIVE SERVICE to perform 24 services as contracted. Represented in Sacramento, California 25 by attorney Michael Sands.
- Defs. FEDERAL BUREAU OF INVESTIGATION and DIRECTOR L. 26 27 PATRICK GRAY, headquartered in Washington, D.C., with local address of 2800 Cottage Way, Sacramento, California. 28
  - 6. Def. "VICTOR MARTINEZ".
  - 7. Other defendants not known to plaintiff. Ronald Reagan-2835

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### G- IV

Plainties one hereby incurporate and adopt by reference. all allogations set forth in Junisomerica (page 2); mittle 23 of the United States Code, Sections 1243 and 1345(b); Title 42 of the United States Orde, Section 1881 of seq.; Americants I, 17, W. VI. VII. and XIV to the Constitution of the United States.

## VI -C

Plaintiff does been'ny incorporate and adopt by reference, all allogations set forth in all couses of action bermin, homeinafter and heralpheiors complained of, for deprivations of priviloges and immediates under color of anthority and pretores of law.

Ronald Reagan-2836

- 84 -

That on August 22, 1975, in the County of Sacramento, State

of California, defendants, under color of authority and pretense

of law, and armed with deadly weapons, and each of them, malici
ously, wantonly, willfully, recklessly, wrongfully, viciously,

without just cause or provocation, restrained,

and violently/ attacked, beat, strangled, handcuffed, illegally

searched and seized, falsely arrested, falsely imprisoned, struck

head and

plaintiff in and about the/face, made other multiple physical

abuses and injuries to plaintiff which required plaintiff to go

to the hospital for care and treatment, violating the security in

one's person, and I, IV, VI, VII and XIV U.S. Constitution Amendmnts.

VI

That by reason of the injuries inflicted by defendants, and each of them, plaintiff was wounded and has suffered bodily pain and discomfort, and has suffered great pain of mind and mental anguish and emotional distress. Plaintiff was not arrested.

VII

That all of the foregoing acts were done and committed and caused by defendants, and each of them, with malice and ill will and with the intent and design of injuring and oppressing plaintiff, and in conspiracy with others, and for that reason plaintiff is entitled to and asks for punitive or exemplary damages as will be demonstrated at trial, and as incorporated herein under DAMAGES from page 274 Ronald Reagan-2837

VIII

That by reason of the injuries inflicted by defendants, and each of them, plaintiff was compelled to and did expend sums for medical care and the employment of physicians and surgeons; by virtue of which plaintiff has incurred debts in amounts to be demonstrated at trial, which sums were necessary, reasonable and proper.

T

That by reason of the injuries inflicted upon plaintiff by

defendants, and each of them, plaintiff will continue to suffer great pain and anguish of body and mind, all to plaintiff's damage, the sum of which will be demonstrated at trial, and as incorporated herein under DAMAGES from page 274.

X

WHEREFORE, plaintiff demands judgment against defendants, and each of them, and others, in the sum and costs to be demonstrated at trial, and compensatory and punitive damages, and such other relief as deemed just and proper by the Court.

# THIRTY-FIRST CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); 28 USC \$\$1343, 1346(b); all causes of action herein, hereinafter, hereinbefore complained of.

This Court has jurisdiction under Title 42, USC; Sec. 1981 et seq., and violations of Due Process and Equal Protection Clauses of the Fourteenth Amendment to the U.S. Constitution.

III

Plaintiff is a citizen of the United States whose business address is Post Office Box 588, Sacramento, California.

IV

Plaintiff believes defendant's name of "Victor Martinez" is an alias, and so sues said "Victor Martinez" as • JOHN DOE-ONE THROUGH ONE HUNDRED.

v

On August 22, 1975, at 801 I Street, Sacramento, California,
the Federal Post Office Building at 8th and I Streets, Sacramenwithout cause or provocation
to, defendant "Martinez" assaulted plaintiff/by wrongfully, unlawfully, intentionally, and menacingly tracking, following, "dogging" plaintiff Eronson inside the U.S. Post Office, after many
months of menacingly tracking, following, "dogging" plaintiff
Ronald Reagan-2838

- 86 -

BROMSON outside the U.S. Post Office and throughout Sacramento County. Each and every time defendant "MARTINEZ" was around plaintiff, plaintiff was immediately alarmed and apprehensive for his safety because of "MARTIMEZ"'s concealed weapon on his person. Plaintiff was constantly, fearfully, and warily shifting his standing, sitting, walking, or driving positions in counter movement to the malicious, wanton, willful or reckless disregard for plaintiff's rights exhibited by one "MARTINEZ".

VI

On August 22, 1975, in the United States Post Office, Sth and I Streets, Sacramento, defendant "MARTINEZ" appeared after plaintiff, and plaintiff feared for his life right in the Post Office by "MARTINEZ" gestures, walk, following, watching, of plaintiff. Plaintiff was so alarmed, fearful and apprehensive with the wrongful behavior of "MARTINEZ" in the Federal Building, that plaintiff warned defendants UNITED STATES GOVERNMENT, FEDER-AL PROTECTIVE SERVICE, LUV SECURITY SERVICE, FPS OFFICERS CLEMONS AND CHASTAINE, and LUV OFFICERS GREER and W.W. SMITH that plaintiff intended to place said "MARTINEZ" under ditizen's arrest for harassment of plaintiff in the federal building.

VII

That on August 22, 1975, defendants, and each of them, knowingly and willfully organized and caused to be organized a new conspiracy and agreement among themselves, and each of them, to stop plaintiff BRONSON by forcible means from placing defendant "MARTINEZ" under citizens arrest, or to stop plaintiff from causing an arrest warrant to be issued for one "MARTINEZ", either from federal or local agencies.
Ronald Reagan-2839

VIII

That on August 22, 1975, defendants FPS and LUV officers did assault, heat, strangle, handcuff, illegally search and seize, falsely arrest, falsely imprison, and make other multiple

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without cause or provocation physical abuses and injuries to plaintiff/under color of authority and pretense of law, and armed with deadly weapons. Plaintiff does hereby incorporate and adopt by reference all allegations set forth in all causes of action herein, hereinbefore and hereinafter complained of.

IX

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore complainted of.

X

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright and injuries thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

KI

WHERIFORE, Plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be demonstrated at trial.

## THIRTY-SECOND CAUSE OF ACTION

I

plaintiff does hereby incorporate and adopt by reference,
all allegations of jurisdiction set forth in JURISDICTION; 28 USC
ss1343,1346(b); 42USC s1981 se seq.; Constitutional Amendment XIV.
Ronald Reagan-2840

II

plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, herein-before and hereinafter complained of, for deprivations of privileges and immunities under color of authority and pretense of law.

III -A

Plaintiff is a citizen of the United States, the UNITED STATES ia a party, and the amount in controversy exceeds, exclusive of interest and costs, Ten Thousand Dollars.

III -B

On August 22, 1975, defendants FPS OFFICERS JAMES CHASTAINE and LUV GREER forcibly took plaintiff from the United States Post Office and forcibly marched plaintiff to his business automobile parked in private parking lot one block away. Plaintiff was menaced by said defendants with deadly weapons, and each of them, for some time at plaintiff's business automobile. Plaintiff not only feared for his continued personal safety, but feared for the personal safety of innocent by-standers as well.

IV

That by reason of said acts plaintiff was placed in great fear for his life and physical well being, and the lives and physical well being of innocent by-standers, defendants then and there having the present ability to continue beating, strangling, handcuffing, falsely arresting, falsely imprisoning, falsely searching and seizing plaintiff again, or carrying out threats to kill plaintiff, acting under color of authority and pretense of law.

V

That by reason of the wrongful and malicious acts of defendants, and each of them, and the pain and wounds and fright caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from Ronald Reagan-2841

VI.

- 89a -

WHEREFORE, plaintiff demands judgment against defendants,

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 $1 \parallel$  and each of them, the nature, extent, sum and costs of which shall be proved at trial, and compensatory damages and punitive damages, and for such other relief as deemed just and proper by this Court.

# THIRTY-THIRD CAUSE OF ACTION

I

Plaintiff does hereby : incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 of the United States Code, Sections 1343, 1346(b); Title 42 of the United States Code, Section 1981 et seq.; and the Fourteenth Amendment to the United States Constitution.

II

Plaintiff does hereby incorporate and adopt by reference,

Ronald Reagan-2842

all allegations set forth herein, hereinafter and hereinbefore complained of, for deprivations of privileges and immunities.

III

plaintiff is a citizen of the United States and the amount in controversy exceeds ten thousand dollars (\$10,000.), exclusive of interest and costs.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE MUNDRED, and therefore sues these defendants by such fictitious names. Plaintiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed and believes and thereon alleges that each of the fictitiously named defendants is responsible in some manner for the occurrences herein, hereinbefore, and hereinafter alleged, and that Plaintiff's damages as herein alleged were caused and proximately caused by such defendants, acting under color of authority and pretense of law.

ij

In 1972, defendants STATE OF CALIFORNIA, ACTORNEY GENERAL
EVELLE J. YOUNGER, security officer, J.C. MARRIS refused to accent plaintiff's filing of charges of criminal acts in California and wrongfully, unlawfully, intentionally, and violently assaulted without cause or provocation plaintiff/by threatening plaintiff with "... we know where you are. We can come and get you at the drop of a sombrero...", with such venom and menage in defendants' Harris' voice and words that plaintiff was immediately placed in great fear for his life and physical well being, deprived of privileges and immunities.

Ronald Reagan-2843

That by reason of the wrongful and malicious acts of defendants and of the fright caused plaintiff, plaintiff began immediately to look around thinking state law enforcement officers, agents, employees, or others, were "on the way", and that plain-

tiff shortly would be unlawfully beaten, maimed, murdered, harassed, or falsely arrested on the spot by armed officers under the color of authority and law breaking down door, - guns drawn, in malicious, wanton, willful or reckless disregard for plaintiff's rights and the rights of others.

VII

That in 1972, defendants, and each of them, knowingly and willfully conspired and agreed among themselves to suppress and withhold from law enforcement wrongfully plaintiff BRONSON's new lifesaving firearms and related technologies.

VIII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore complained of.

IX

By reason of the wrongful, intentional, conspiratorial, and malicious acts of defendants, and each of them, and of the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain and has been injured in mind and body, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

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WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be demonstrated at trial; compensatory and punitive damages.

# THIRTY-FOURTH CAUSE OF ACTION Ronald Reagan-2844

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Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); 28 USC 551343, 31 1346(b); 42 USC \$1981 et seq.; Amendment XIV to Constitution.

Plaintiff does herevy incorporate and adopt by reference. all allegations set forth herein, hereinafter and hereinbefore com plained of, for deprivations of privileges and immunities.

Plaintiff is a citizen of the United States whose business address is Post Office Box 588, Sacramento, California, and the amount in controversy exceeds ten thousand dollars (\$10,000.), exclusive of interest and costs.

ΙV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants by such ficticious names for damages caused and proximately caused to plaintiff.

On August 17, 1972, Defendants STATE OF CALIFORNIA, STATE ATTORNEY GENERAL EVELLE J. YOUNGER, special agent ANDREW TICKVITZA without cause or provocation wrongfully, unlawfully and intentionally/conspired and acted to deliberately intimidate and harass person known by plaintiff at that person's place of employment in malicious, wanton, willful or reckless and conspiratorial disregard for the rights and privacy of plaintiff and others. Under the color of authority, defendants' Tickvitza's conduct and words caused immediate fear, apprehansion and alarm for that person's safety, the safety of Plaintiff BRONSON, and the safety of others. Ronald Reagan-2845

When Plaintiff BRONSON was informed of Defendants' Teckvitza's wrongful, malicious conduct toward person known to plaintiff, plaintiff was immediately alarmed and apprehensive for his personal safety and well being, and feared for the safety and Plaintiff feared that law enforcement well being of others. officers, under color of authority and law, were immediately acting in official capacities, and deprive plaintiff, under color of such - 92 -

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police authority, viciously attack plaintiff with deadly weapons, ambush plaintiff, and deprive plaintiff of Constitutional privileges immunities by force, violence, maiming, attempted murder on p'tiff and others. Plaintiff and others remained in constant fear and dread for their safety from that time forward.

VII

That from 1972 forward, defendants, and each of them, knowingly and willfully conspired and agreed among themselves to suppress and wrongfully withhold from law enforcement Plaintiff BRONSON's new lifesaving firearms and related technologies by terror tactics and threats to the lives and personal safety of plaintiff and others.

VIII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore complained of.

IX

By reason of the wrongful, intentional, conspiratorial, and malicious acts of defendants, and each of them, and of the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain and has been injured in mind and body, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

#### Ronald Reagan-2846

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WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be demonstrated at trial.

## THIRTY-FIFTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); 28 USC \$\$1343,

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1346(b); 42 USC \$1981 et seq.; Constitutional Amendment XIV.

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Plaintiff does hereby incorporate and adopt by reference, all allegations set forth herein, hereinafter and hereinbefore complained of, for deprivations of privileges and immunities.

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Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV '

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants by such fictitious names. Plaintiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed and believes and thereon alleges that each of the fictitiously named defendants is responsible in some manner for the occurrences herein, hereinbefore, and hereinafter alleged, and that Plaintiff's damages as herein alleged were caused and proximately caused by such defendants.

7

Frequently in 1973, on April 1525, 1974, May 3, 1974, May 14, 1974, November 5, 1976, June 4, 1977, and February 25, 1973, defendants JOHN DOES ONE THROUGH ONE MUNDRED have acted with malicious, wanton, willful or reckless disregard for plaintiff's rights and safety, and the rights and safety of others, and withoutcause or provocation sabotaged plaintiff's business equipment to the severe extent that plaintiff and others would be permanently maimed or killed in attempting to regularly use the sabotaged equipment. Ronald Reagan-2847

That by reason of the wrongful and malicious acts of defendants and of the immediate and continuing alarm, fear, apprehension for plaintiff's personal safety and well being, and for the

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was deprived privileges and immunities guaranteed to plaintiff in I,IV,V,VI,VII and XIV Amendments. Plaintiff feared that at any time defendants, and each of them, some members of the law enforcement community with duty to protect plaintiff and others,—not harm them, would unlawfully murder, permanently maim or destroy plaintiff and others, and business equipment regularly used.

VII

That in 1972 forward, defendants, and each of them, knowingly and willfully conspired and agreed among themselves to suppress and withhold from law enforcement, wrongfully, plaintiff
BRONSON's new lifesaving firearms and related technologies by
terror tactics and threats to the lives and personal safety of
plaintiff and others.

#### VIII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore complainted of.

IX

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAM-AGES from page 274.

X

wherefore, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be demonstrated at trial, and compensatory and punitive damages, and for such other relief as deemed just and proper by this Court.

Ronald Reagan-2848

## THIRTY-SIXTH CAUSE OF ACTION

Plaintiff does hereby incorporate and adopt by reference,

Plaintiff does hereby incorporate and adopt by reference,

all allegations set forth herein, hereinbefore, and hereinafter com-

plained of, for loss of privileges and immunities under color of law-

Plaintiff is a citizen of the United States, and the amount

Plaintiff does not know the true names and capacities of de-

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fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and

therefore sues these defendants, and each of them, by such ficti-

tious names for damages caused and proximately caused to plaintiff

in controversy exceeds ten thousand dollars.

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all allegations set forth in JURISDICTION (page 2); 28 USC \$\$1343, 1346(b); 42 USC \$1981 et seq.; Constitutional Amendment XIV.

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On or about August 26, 1973, defendants AMERICAN TELEPHONE AND TELEGRAPH, PACIFIC TELEPHONE AND TELEGRAPH, agents and employees wrongfully, unlawfully, intentionally, and violently assaulted without cause or provocation plaintiff by threatening plaintiff/with " ... punch you in the nose...", and refused to permit plaintiff to file criminal charges of illegal wiretapping, eavesdropping, impersonation of an FBI agent on an illegally and intentionally interfered with and dis-26 rupted business telephone line, etc., hereinbefore and hereinafter complained of. Under color of authority of a public utility 28 charging for the services rendered to plaintiff and others, defen-29 dants' employee and agent acted to throw plaintiff bodily from 30 the business premises of the public utility, and by their acts,

31 voice and words made plaintiff immediately in great fear for his

32 | life and physical well being, causing plaintiff to leave the busi-

96Renald Reagan-2849

ness premises without compleating plaintiff's lawful business.

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Plaintiff BRONSON was immediately alarmed, fearful, and apprehensive for his personal safety and well being, and for the safety and well being of others. Plaintiff feared that defendants, and each of them, were shortly to beat, maim or murder plaintiff, and as defendants, and each of them, intended, plaintiff's well founded criminal charges of illegal wiretapping and other illegal electronic invasion of plaintiff's business equipment, were ignored and continued to present time by said defendants, and each of them; defendants, and each of them refuse to investigate, remove and otherwise take corrective action.

VIT

That in 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, to suppress and wrongfully withhold from law enforcement plaintiff BRONSON's new lifesaving firearms and related technologies by illegal acts and conspiracies to illegally wiretap plaintiff's business telephone without cause.

VIII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy 24 and agreement above alleged, and hereinafter and hereinbefore complained of.

IX

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused 29 plaintiff and others, plaintiff has suffered extreme and severe 30 mental anguish and physical pain, and has been injured in mind 31 and body and earning capacity, the nature and extent of which 32 shall be proved at trial, and as incorporated herein under DAMAGES, Ronald Reagan-2850

the nature and extent of which shall be proved at trial.

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WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

### THIRTY-SEVENTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28, USC \$\$1343,1346(b); 42 USC \$1981 et seq.; the Fourteenth Amendment to the Constitution;

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action hereinbefore and hereinafter complained of, for loss of rights under color of authority, particularly as protected by the Fourth Amendment to the Constitution of the United States.

III

Plaintiff is a citizen of the United States, the UNITED STATES is a party, and the amount in controversy exceed, exclusive of interests and costs, Ten Thousand Dollars.

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

# Ronald Reagan-2851

Defendants are:

Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTOR CLARENCE

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#### M. KELLEY.

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- 2. Def. AMERICAN TELEPHONE AND TELEGRAPH COMPANY (AT&T), headquarters 195 Broadway, New York, New York 10007.
- Def. PACIFIC TELEPHONE AND TELEGRAPH COMPANY DIVISION OF AT&T, Northern California Headquarters, 140 New Montgomery Street, San Francisco, California 94105; Sacramento Area Headquarters, 1407 "J" Street, Sacramento, California.
- 4. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER, GOVERNOR EDMUND G. BROWN, Jr., GOVERNOR RONALD REAGAN, State Capitol, Sacramento, California.

VI

On the following example dates, 1973: 2/9,13; 3/12-15; 7/13; 8/30,31; 9/4,24; 11/20; 1974: 1/10,16; 2/7,28; 5/8,14; 11/8,14; 12/6,7; 1975: 1/15; 2/4,5,8,9,11; 4/21,22; 7/8; 9/9; 1976: 1/19, defendants agents and employees illegally electronically caused or forced plaintiff's business telephone to "ring" (strange sound) or "malfunction", especially during off non-business hours. Without Court order, search warrant, without cause or provocation, under color of authority and pretense of law, defendants, and each of them, maintained and maintain to present illegal surveillance of plaintiff's business telephone in malicious, wanton, willful, intentional, wrongful, conspiratorial disregard for the rights of plaintiff and others each and every time, depriving to plaintiff privileges and immunities guaranteed by Amendments I, IV, V, VI, VII, and XIV of the Consitution of the United States.

VII

That each and every time defendant(s) did these acts and things herein complained of, defendant(s) invaded plaintiff's right of privacy and right to uninterrupted, nonmonitored business telephone use for lawful purposes Ronald Reagan-2852

VIII

The above-mentioned wrongful, conspiratorial, malicious, war-32 rantless, and willful acts constituted an invasion of plaintiff's

right of privacy in that plaintiff in no way consented to or author ized the warrantless search and illegal wiretap and electronic 3 invasion of plaintiff's business telephone, nor did plaintiff submit voluntarily to these wrongful invasions by wiretapping illegally of plaintiff's business telephone.

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The above-mentioned acts and conduct of the defendants, and each of them, claimed by them to be under federal and/or state and/or regulated public utility authority, constituted an abuse of their federal and/or state and/or regulated public utility authority and was not within their scope of employment as federal and/or state and/or regulated public utility agents, employees or servants, in that their acts and conduct were not based on the exercise or performance of discretionary function or duty assumed by them as agents or employees or servants of the federal govern-16 ment's FEDERAL BUREAU OF INVESTIGATION and/or state government's ATTORNEY GENERAL'S OFFICE and/or regulated public utility and were not acts and conduct done pursuant to the regulations of the UNITED STATES ATTORNEY GENERAL/FEDERAL BUREAU OF INVESTIGATION and/or STATE ATTORNEY GENERAL'S OFFICE and/or regulated public TELEPHONE utility and ware acts performed within the scope of defendant(s) employment but without exercising due care while acting within the scope of their employment, and defendants, and each of them, acted in fraud, corruption or malice.

Y

As a result of the above-mentioned conduct of the defendants, and each of them, plaintiff was deprived of rights, privileges, 23 and immunities secured to him by the Constitution and Laws of the 29 United States in that such conduct constituted an arbitrary in-30 trusion by defendant(s) upon the security of plaintiff's privacy 31 and body, thereby depriving plaintiff of life, liberty, and prop-32 erty without due process of law and plaintiff is entitled to re-

lief under Title 42 of the United States Code under Section 1983.

XI

That by reason of the injuries inflicted by defendants, and each of them, plaintiff was frightened and has suffered bodily pain and discomfort, and has suffered great pain of mind and mental anguish and emotional distress.

That from 1972 to present time, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and 11 with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegal acts

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Ronald Reagan-2854

and conspiracies to illegally wiretap plaintiff's business telephone without causeor provocation under color of authority.

X

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore complained of.

XI

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAM-AGES from page 274.

XII

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, sum and costs to be proved at trial, and other just and proper relief.

### THIRTY-EIGHTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference,
all allegations set forth in Paragraph I-VI, JURISDICTION, Title
\$1343,
28 U.S.C./\$1346(b); 42 USC \$1981 et seq; Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action hereinbefore and hereinafter complained of, loss of rights under color of authority Ronald Reagan-2855

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars; deprivations to Due Process and Equal Protection Clauses of Amendment MIV, Constitution.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

From 1972 to present time, defendants CITY OF SACRAMENTO,

SACRAMENTO POLICE DEPARTMENT, POLICE CHIEF WILLIAM J. KINNEY,

without cause or provocation,

agents and employees, wrongfully, unlawfully, intentionally, and

maliciously assaulted plaintiff with deadly weapons (guns and

cars), and did other wrongful acts. Defendants' uniformed officers repeatedly drove CITY OF SACRAMENTO motor vehicles and harassed, followed, stalked, tracked, attempted to ram plaintiff's

business automobile, and otherwise abuse plaintiff, as plaintiff

conducted plaintiff's lawful business. Further, defendants, and

each of them, did; under color of authority and pretense of law:

- (1) Track plaintiff through the streets of Sacramento by CITY OF SACRAMENTO decaled vehicles and uniformed officers of the SACRAMENTO POLICE DEPARTMENT throughout the summer of 1973, and especially January 23, 1974 and May 8, 1974; followed plaintiff for blocks at a time in 1975 and 1976, especially May 5, 1975, February 10, 1976, and April 25, 1976.
- (2) Come close enough to plaintiff during the summer of 1974 and on July 23, 1975 for plaintiff to identify "BADGE NO. 295" of the CITY OF SACRAMENTO POLICE DEPARTMENT.
- (3) Come close enough to plaintiff for plaintiff to identiby "BADGE NO. 341, OFFICER GORSKI OF THE SACRAMENTO POLICE DEPARTMENT on October 3, 1974 and May 14, 1975.
- (4) That on October 3, 1974, defendants' OFFICER GORSKI tracked and menaced plaintiff all over McKinley Park, Sacramento.
- (5) That the attempted ramming of plaintiff's legally parked business vehicle occurred on or about February 10, 1976.
  All conspiracies and acts herein complained of deprived plaintiff

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of lawful, unharassed use of CITY OF SACRAMENTO streets.

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28 U.S.C./\$1346(b); 42 USC \$1981 et seq., Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, Ronald Reagan-2857

VI

That from 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally acting and conspiring to assault plaintiff with deadly weapons repeatedly.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore complained of, under color of authority and pretense of law.

VII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved attrial, and as incorporated herein under DAMAGES from page 274.

VIII

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, sum and costs to be proved at trial, and other just and proper relief from Court

Plaintiff does hereby incorporate and adopt by reference,

all allegations set forth in Paragraphs I-VI, JURISDICTION, Title

# THIRTY-NINTH CAUSE OF ACTION

all allegations set forth herein, hereinafter and hereinbefore complained of, for deprivations of privileges and immunities.

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Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV

Plaintiff does not know the true names and cpapcities of defendants used herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff

On or about January 23, 1974, defendants STATE OF CALIFORNIA. STATE CONTROLLER HOUSTON I. FLOURNOY caused defendants STATEOF CALIFORNIA, STATE POLICE, and others, to wrongfully, unlawfully, intentionally, and violently assault plaintiff with deadly weapwithout cause or provocation. ons on private business property/. Defendants, and each of them, sent state agents and employees in two (2) cars to willfully, unlawfully and violently use force on plaintiff, or other malicious, wanton, willful or reckless disregard for plaintiff's rights. fendants' agents and employees trespassed on business property and prevented plaintiff from leaving building. Defendants' agents and employees sat in the cars for some time, assaulting plaintiff, humiliating, outraging and embarrassing plaintiff, and prevented plaintiff from conducting his lawful business activities.

7I

That in 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting plaintiff, and deprived plaintiff of privileges and im-32 munities guaranteed by the Constitution under color of authority and Ronald Reagan-2858 law.

- 105 -

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authroity and pretense of law.

VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be demonstrated at trial, compensatory and punitive damages.

### FORTIETH CAUSE OF ACTION

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Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); 28 USC \$\$1343, 1346(b); 42 USC \$1981 et seq.; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth herein, hereinafter, hereinbefore complained of, for loss of privileges and immunities under color of law.

III

Plaintiff is ■ citizen of the United States, and the amount in controversy exceed ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herin as JOHM DOES ONE THROUGH ONE HUNDRED, and Ronald Reagan-2859

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therefore sues these defendants, and each of them, by such factitious names for damages caused and proximately caused to plaintiff.

On or about January 23, 1976, defendants STATE OF CALIFORNIA, CALIFORNIA HIGHWAY PATROL, agents and employees, acting under without cause or provocation, color of authority and pretense of law/ operated a pursuit plane wrongfully, unlawfully, intentionally, maliciously, and violently in assault on plaintiff while taking his usual therapeutic morning walk at Miller Park, a walk known to law enforcement agents and employees. Defendants made roaring, wide-throttle swoop too law over plaintiff, circling plaintiff in a roaring low "U" turn. Said defendants, and each of them, acted in malice, wanton, wilful or reckless disregard for plaintiff's rights, and almost burst plaintiff's eardrums, caused violent, blinding headache, and rendered plaintiff unable to drive for several hours.

VI

That in 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting and battering plaintiff.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law.

Ronald Reagan-2860

VIII

By reason of the wrongful, intentional, and malicious acts wounds and of defendants, and each of them, and the/fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental an-

guish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, sum and costs to be proved at trial, and such other relief deemed just and proper.

### FORTY-FIRST CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action filed herein.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 USC \$1343, '\$1346(b); 42 USC \$1981 et seq; Equal Protection Clause XIV Amend.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

On or about February 3, 1976, defendants STATE OF CALIFORNIA, without cause or provocation CALIFORNIA HIGHWAY PATROL, and others, retaliated against plaintiff for reporting on or about January 23, 1976, to defendant CALIFORNIA STATE HIGHWAY PATROL OFFICIALS, and others, that defendants illlegally, unlawfully, and negligently flew defendant's pursuit plane in diving, circling assault of plaintiff on January 23, 1976.

Defendants, under color of authority and pretense of law, tracked, Ronald Reagan-2861

"dogged", and harassed plaintiff on the streets of Sacramento while plaintiff was attempting to conduct his lawful business.

VI

That from 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting plaintiff.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law, and deprived plaintiff of privileges and immunities from harm.

### VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, which shall 27 be proved at trial, and other relief deemed just and proper by Court.

# FORTY-SECOND CAUSE OF ACTION

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in Paragraphs I-VI, JURISDICTION, Title 28 U.S.C./\$1346(b); 42 USC \$1981 et seq; Amendment XIV.

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Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action complained of herein, hereinafter, hereinbefore, for damages under color of law.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

TV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff

On or about February 3, 1974, defendants STATE OF CALIFORNIA and CHIEF GUY R. OATES, CALIFORNIA STATE POLICE, assaulted, falsely arrented, and falsely without cause or provocation imprisoned plaintiff in the California State Capitol, and refused to permit plaintiff to leave the offices of defendant STATE POLICE WHEN PLAINTIFF DEMANDED TO DO SO. Said defendants, and each of them, stopped plaintiff from exercising his right to freedom of speech, due process of law, and right to conduct plaintiff's lawful business in a lawful manner, and the right to pursue plaintiff's lawful activities in a lawful manner without intimidation and interference and malicious disregard for plaintiff's rights under the color of authority and pretense of law.

VI

That from 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting, falsely imprisoning and falsely arresting 32 plaintiff, depriving plaintiff of Constitutional privileges and imunities.

Ronald Reagan-2863

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complainted of, acting under color of authority and pretense of law.

VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be demonstrated at trial. compensatory and punitive damages.

# FORTY-THIRD CAUSE OF ACTION

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); 28 USC 55 1343,1346(b); 42 USC 51981 et seq.; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinafter, hereinbefore complained of, for damages under color of law.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of de-Ronald Reagan-2864

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fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

On or about September 29, 1972, defendants STATE OF CALI-FORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER, and others, agents and employees, under color of authority and pretense of law, harassed, abused, intimidated, embarrassed, humiliated, restrained and otherwise obstructed and interfered with plaintiff in the without cause or provocation. U.S. Post Office, 8th and I Streets, Sacramento/ One agent or employee of defendants identified himself as a "Mr. Baier". Defendants agents and employees were not only accosting plaintiff for defendant CALIFAORNIA STATE ATTORNEY GENERAL YOUNGER, but also for defendant FEDERAL BUREAU OF INVESTIGATION and the NIXON ADMINISTRATION.

VI

Plaintiff was obstructed from leaving the post office as he wished by said two (2) agents and employees of defendants acting under color of authority and pretense of law. Plaintiff was fearful and apprehensive about being attacked and "jumped" by two (2) Plaintiff demanded that said defendants, their agents armed men. and employees, and each of them, submit all questions to plaintiff in writing and addressed to plaintiff's attorney. Said defendants refused and forcibly conducted and continued their assault, obstruction, harassment, intimidation, humiliation, and embarrassment of plaintiff in an open public place crowded with innocent people seeking postal service.

VII

That from 1972 forward, defendants, and each of them, and with others, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, to suppress and wrongfully withhold from law enforcement plaintiff's new Ronald Reagan-2865

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lifesaving law enforcement technologies by illegally assaulting and obstructing plaintiff, and depriving plaintiff of privileges and immunities guaranteed to plaintiff by I, IV, VI, VII, XIV Amendmts.

VIII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law.

IX

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

X

wherefore, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, to be proved at: trial, and such other relief as deemed just and proper by Court.

# FORTY-FOURTH CAUSE OF ACTION

I

plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2):; Title 28 USC \$1343, /\$1346(b); 42 USC \$1981 et seq.; Constitution Amendment XIV.

II

plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein complained of, loss of privileges/immunities under color of law.

III

plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

Ronald Reagan-2866

- 113 -

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IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

On or about September 21 and 27, 1973, defendants STATE OF CALIFORNIA, CALIFORNIA STATE POLICE, CHIEF GUY OATES, and others, without cause or provocation, caused STATE POLICEagents and employees to stalk, track and "dog" plaintiff, on foot and in car, away from State property. Under color of authority and pretense of law, said defendants prevented plaintiff from freely exercising plaintiff's rights of due process of law, lawful pursuit of business activities, free from fear or intimidation or worrying as to just when defendants' uniformed and gun-carrying officers would assault and injure plaintiff severely in his body or mind.

VI

That from 1972 forward, defendants, and each of them, and with others, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting plaintiff.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law.

Ronald Reagan-2867

VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused

plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be demonstrated at trial. compensatory and punitive damages.

# FORTY-FIFTH CAUSE OF ACTION

I

plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); 28 USC 551343, 1346(b); 42 USC 51981 et seq.; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, herein-before, hereinafter complained of for damages under color of law.

TTT

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV

plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of the, by such fictitious names for damages caused and proximately caused to plaintiff.

Ronald Reagan-2868

On orabout September 30, 1972, defendant FEDERAL BUREAU OF INVESTIGATION, agents and employees, under color of authroity and pretense of law, wrongfully, unlawfully, intentionally, and violently assaulted plaintiff with deadly weapons on private business

property. Defendants, and each of them, sent FBI agents and employees to willfully, unlawfully and violently use force on plaintiff, or other malicious, wanton, willful or reckless disregard for plaintiff's rights. Defendants' agents and employees trespassed on business property and prevented plaintiff from leaving building. Defendants' agents and employees sat in the car for some time, assaulting plaintiff, humiliating, outraging and embarrassing plaintiff, and prevented plaintiff from conducting his lawful business activities in loss of privileges and immunities.

VI

That in 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with
others, to suppress and wrongfully withhold from law enforcement
plaintiff's new lifesaving firearms and related technologies by
illegally assaulting plaintiff.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law.

### VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274. Ronald Reagan-2869

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which

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shall be proved at trial, and compensatory and punitive damages, and such other relief deemed just and proper by this Court.

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FORTY-SIXTH CAUSE OF ACTION

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); 28 USC \$\$1343, 1346(b); 42 USC \$1981 et seq.; Constitutional Amendment XIV.

TT

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinbe fore, hereinafter complained of, for damages under color of law.

III

Plaintiff is a citizenof the United States, and the amount in controversy exceeds ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as HOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

On or about October 4, 1972, defendant FEDERAL BUREAU OF INVESTIGATION agents and employees, including one "TOMMY RAY", under color of authority and pretense of law, harassed, abused, intimidated, embarrassed, humiliated, restrained, and otherwise obstructed and interfered with plaintiff in the U.S. Post Office, 8th and I Streets, Sacramento.

VT

Plaintiff was obstructed from leaving the Post Office as he wished by said tow (2) agents and employees of defendants FBI, L. PATRICK GRAY DIRECTOR, acting under color of authority and pretense of law. Plaintiff was fearful and apprehansive about Plaintiff debeing attacked and "jumped" by two (2) armed men. manded that said defendants, their agents and employees, and Ronald Reagan-2870

each of them, submit all questions to plaintiff in writing and addressed to plaintiff's attorney. Said defendants refused and forcibly conducted and continued their assault, obstruction, harassment, intimidation, humiliation, and embarrassment of plaintiff in an open public place crowded with innocent people seeking postal service.

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When plaintiff managed to get out of the Post Office, defendant's FBI agent "TOMMY RAY" stalked and "dogged" plaintiff down the street to City Hall, up the stairs and into the City Hall not follow plaintiff and building. FBI agent "RAY" refused to/leave plaintiff alone.

VIII

That from 1972 forward, defendants, and each of them, and 14 with others, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting and obstructing plaintiff, under color and pretense of authority.

IX

That defendants, and each of them, did the acts and things 21 herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law, interferring with plaintiff's Constitutional privileges and immunities.

X

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from 32 page 274.

Ronald Reagan-2871

XI

WHEREFORE, plaintiff demands judgement against defendants, and each of them, compensatory and punitive damages, to be proved at trial, and such other relief deemed just and proper by the Court.

### FORTY-SEVENTH CAUSE OF ACTION

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incorporate and adopt by reference, Plaintiff does hereby all allegations set forth in JURISDICTION (page 2); Title 28 USC \$1343, %s1346(b); 42 USC \$1931 se seq.; Constitutional Amendment XIV.

TT

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein complained of for loss of privileges and immunities under color of authority.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars; U.S. a party.

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

On or about October 4, 1972, defendants FBI, JOHN REED AGENT IN CHARGE, L. PATRICK GRAY DIRECTOR, agents and employees, under without cause or provocation, color of authority and pretense of law,/retaliated against plaintiff for plaintiff's insistance that the FBI immediately stop harassment and abuse of Plaintiff BRONSON. FBI AGENT IN CHARGE JOHN REED and other agents and employees forcibly, violently, loudly, wrongfully, unlawfully, maliciously and wantonly, yelling, 30 "surrounded" the building in which plaintiff was conducting busi-31 ness with drawn handguns, rifles and walkie talkies. Defendants 32 threatened violent force against plaintiff and trespassed on busin Ronald Reagan-2872

ness property and prevented plaintiff from leaving building. Defendants' agents and employees sat in cars and milled around the building for some time, assaulting plaintiff, humiliating, outraging and embarrassing plaintiff, and prevented plaintiff from conducting his lawful business activities.

VI

That in 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting plaintiff.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law, and invaded plaintiff's guaranteed privileges and immunities.

VIII

By reason of the wrongful, inten ional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial.

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### FORTY-EIGHTH CAUSE OF ACTION

Plaintiff.does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); 28 USC \$\$1343, 1346(b); 42 USC \$1981 et seq.; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinbefore, hereinafter complained, of for damages under color of law.

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

III

TV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff

On August 27, 1976, defendant SACRAMENTO MUNICIPAL UTILITY

DISTRICT (SMUD), employee JACK DEBOISE, was sent to restore
earlier unlawfully and illegally discontinued service to business
property, said service having been illegally discontinued in
retaliation against plaintiff for plaintiff's having filed this
lawsuit before this Court. When plaintiff demanded why the service had been wrongfully discontinued when there was no outstanding charge owed to defendant SMUD, defendant SMUD's agent and emithout cause or provocation,
ployee/threatened plaintiff and started swinging his fist at plain
tiff. When defendant's employee was a witness, defendant's employee dropped his fist, stopped his swing at plaintiff, turned
on the illegally disconnected service, and left.

That defendants, and each of them, knowingly and willfully Renamine Renamin

VI

organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new life-saving firearms and related technologies by illegally assaulting plaintiff, and depriving him of guaranteed immunities from harm.

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That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, and under color of authority and pretense of law.

VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

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WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, compensatory and punitive damages.

# FORTY-NINTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); 28 USC \$\$1343, 1346(b); 42 USC \$1981 et seq.; Constitutional Amendment XIV.

Ronald Reagan-2875

plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinbefore and hereinafter complained of, for depriving plaintiff of privileges and immunities under color of authority and pretense of law.

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Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff

V

In July 1976, defendants STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, JR., ang guvernatorial assistant MARC POCHE, wrongfully, unlawfully, intentionally, maliciously, disregarded their duty toward plaintiff when plaintiff attempted to communicate criminal without cause or provocation. acts occurring in the State of California/ Defendant MARC POCHE, in GOVERNOR BRCWN's presence, to plaintiff's information and belief, threatened plaintiff in a hard ex-U.S. Marine voice: off this phone - everything will be taken care of". Then plaintiff BRONSON knew that under the color of authority and pretense of law, defendants BRCWN and POCHE meant to shortly and immediately send more STATE POLICE OFFICER, AGENTS or EMPLOYEES, or others, to beat, maim, harass, assault, attempt to kill, and otherwise severely threaten plaintiff's personal safety. Plaintiff continues to live in fear, alarm and apprehension of bodily harm at the hands of defendant STATE OF CALIFORNIA, or others, under color of authority or pretense of law, to get def. BROWN elected President.

VI

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new life-saving firearms and related technologies by illegally assaulting plaintiff, and to suppress defendant GOVERMOR BROWN's coverup of Ronald Reagan-2876

- 123 -

1 crimes committed in California and in the BROWN ADMINISTRATION of which plaintiff was knowlegeable, to get BROWN elected President

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, under color of authority and pretense of law.

#### VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and others, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind, and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, compensatory and punitive damages.

## FIFTIETH CAUSE OF ACTION

T

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); 28 USC \$\$1343, 1346(b); 42 USC \$1981 et seq.; Constitutional Amendment XIV.

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinbefore, hereinafter complained of for loss of privileges and immunities.

III

plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

Ronald Reagan-2877

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Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH CNE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff

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Defendants are:

Def. STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, Jr. State Capitol, Sacramento, California. 9

V

- Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER, 555 Capitol Mall, Sacramento, California.
  - Def. MARC POCHE, gubernatorial assistant, Office of the Governor, State Capitol, Sacramento, California.
  - Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE, CHIEF GUY R. CATES, State Capitol, Sacramento, California.
- Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE OFFICER L.D. SHERWOOD (BADGE NO. 4), State Capitol, Sacramento, California
- Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE OFFICER S.W. WESTON, State Capitol, Sacramento, California.
  - Other defendants present and not known to plaintiff.

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On February 11, 1977, defendants STATE OF CALIFORNIA, GOVERN-OR EDMUND G. BROWN, JR., MARC POCHE, ATTORNEY GENERAL EVELLE J. YOUNGER, CALIFORNIA STATE POLICE CHIEF GUY R. OATES, and others, without cause or provocation, retalialiated against plaintiff for filing this lawsuit before this Court, and instituted and completed defendant MARC POCHE's threats of bodily harm toward plaintiff. Said defendants, and each of them, wrongfully, unlawfully, maliciously, and contemptuously, under color of authority and pretense of law, used defendants armed CARIFORNIA STATE POLICE OFFI-31 CERS L.D. SHERWOOD (BADGE NO. 4) and S.W. WESTON, and others not

32 known to plaintiff, to deprive plaintiff and others of privileges \_\_\_\_\_Ronald Reagan-2878

and immunities guaranteed to plaintiff as macitizen of the United States, by Amendments I, TV, V, VII, and XIV of the Constitution of the United States, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment. Defendants, and each of them, interferred with party to this Court proceeding by assaulting plaintiff and others while plaintiff lawfully attended a California administrative hearing at 1006 Fourth Street, Sacramento, California. Said defendants, and each of them, in contempt for judicial and administrative proceedings and parties, "dogged", followed, stalked, obstructed, harassed, abused, assaulted, and otherwise wrongfully pursued plaintiff and others with deadly weapons, preventing plaintiff and others from peaceful lawful assembly, presence and attendance at said administrative hearing. Plaintiff and others were deprived of their rights and not permitted to conduct business affairs before the administrative 16 hearing as plaintiff intended and as provided by law. The preventing of plaintiff to conduct business before the administrative hearing occurred wrongfully under color of authority and pretense of law by defendants.

VII

The defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement amont themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies, to suppress, wrongfully silence, and wrongfully retaliate against plaintiff for filing complaint before this Court, to suppress and wrongfully cover-up GOVERNOR BROWN's wrongful cover-up of crimes committed in Califormia and scandals in the Brown Administration of which plaintiff is knowledgeable, and for other motives which shall be demonstrated at trial, by illegally assaulting and threatening plaintiff.

Ronald Reagan-2879

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VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, under color of authority and pretense of law.

VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and others, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and compensatory damages and punitive damages, and such other relief as deemed just and proper by this court.

# FIFTY-FIRST CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, allegations set forth in JURISDICTION (page 2); 28 USC 581343, 1346(b); 42 USC \$1981 et seq; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinbefore and hereinafter complained of, for deprivations of privileges and immunities under color of law.

III

Plaintiff is a citizen of the United States; amount in con-Ronald, Reagan-2880

troversy exceeds Ten Thousand Dollars.

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

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Ronald Reagan-2881

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#### Defendants are:

1. Def. STATE OF CALIFORNIA, CALIFORNIA ATTORNEY GENERAL EVELLE J. YOUNGER, 555 Capitol Mall, Sacramento, California.

2. Def. STATE OF CALIFORNIA, "MR. ALEXANDER, OFFICE OF THE ATTORNEY GENERAL, 555 Capitol Mall, Sacramento, California.

VI

On or about January 23, 1975, defentant agent, employee, or servant, "MR. ALEXANDER", refused to log charges of criminal acts (illegal wiretapping, etc.) committed in California, but instead, under color of authority and pretense of law, without cause or provocation, defendant agent, employee or servant wrongfully, will fully, maliciously, and negligently threatened plaintiff with bodily harm. When plaintiff calmed down and shortly called the ATTORNEY GENERAL'S OFFICE for "MR. ALEXANDER", plaintiff was advised that there was no such person in the OFFICE OF THE ATTORNEY GENERAL. Plaintiff was immediately fearful and apprehensive for his personal safety in that again defendant ATTORNEY GENERAL YOUNG ER had his agents and employees out after plaintiff. As defendants intended, and each of them, plaintiff was quite ill for some days after. Defendants prevented plaintiff from filing his charges.

VII

That from 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with
others, to suppress and wrongfully withhold from law enforcement
plaintiff's new lifesaving firearms and related technologies by
illegally assaulting plaintiff

VIII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore

Ronald Reagan-2882

- 129 -

inbefore complained of, in malice, ill will, and acting under color of authority and pretense of law, the result of which was invasion of plaintiff's guaranteed privileges and immunities from police harassment and abuse set forth in Amendments I, IV, V, VI, VII and XIV of the Constitution of the United States.

XIV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XV

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

Ronald Reagan-2883

### FIFTY-SECOND CAUSE OF ACTION

T

The Court has jurisdiction in this matter under Title 29, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly \$5 1932,1933,1935,1936, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title
28, United States Code, Secs. 1331 and 1343, this being a suit in
equity authorized by law; Title 42, United States Code, Sec. 1933,
to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation
under color of statute, ordinance, regulation, custom or useage
of a State of rights, privileges, and immunities secured by the
Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those
secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States
Constitution. The matter in controversy, exclusive of interest
and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).
Ronald Reagan-2884

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

- 131 -

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1 of the privileges and immunities guaranteed to plaintiff by Amendments I, IV, VI, VII, and XIV to the United States Constitution.

IV

Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars.

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff,

VI -A

#### Defendants are:

- 1. Def. FEDERAL PROTECTIVE SERVICE (FPS) of the UNITED STATES GENERAL SERVICES ADMINISTRATION (GSA). Headquarters of the GSA are Washington, D.C. Local headquarters of the FEDERAL PROTECTIVE SERVICE (FPS) is 650 Capitol Mall, Sacramento, California.
- 2. Defs. OFFICER CLEMONS (BADGE 3327), OFFICER JAMES CHAS-TAINE, and CLARENCE SNELSON, uniformed agents and employees of the 19 ||Sacramento FEDERAL PROTECTIVE SERVICE office.
  - 3. Defs. OFFICER GREER and OFFICER W.W. SMITH (BADGE 30), uniformed agents and employees of LUV SECURITY SERVICE, Sacramento
- 4. Def. LUV SECURITY SERVICE, Sacramento, California, under contract to the defendant FEDERAL PROTECTIVE SERVICE to perform 24 services as contracted. Represented in Sacramento, California 25 by attorney Michael Sands.
- 5. Defs. FEDERAL BUREAU OF INVESTIGATION and DIRECTOR L. 27 PATRICK GRAY, headquartered in Washington, D.C., with local address of 2800 Cottage Way, Sacramento, California.
  - 6. Def. "VICTOR MARTINEZ".
  - 7. Other defendants not known to plaintiff.

Ronald Reagan-2885

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### VI -B

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTICE (page 2); Title 23 of the United States Code, Sections 1343 and 1346(b); Title 42 of the United States Code, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and KIV to the Constitution of the United States.

### VI -C

plaintiff does hareby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinafter and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pretense of law.

Ronald Reagan-2886

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That on August 22, 1975, in the County of Sacramento, United States Post Office, 801 I Street, Sacramento, California, defendants, and each of them, under color of authority and pretense of 5 law, and armed with deadly weapons, and each of them, maliciously, wantonly, willfully, recklessly, wrongfully, unlawfully, and without cause or provocation, violently attacked, beat, strangled, handcuffed, illegally search and seized, falsely arrested, false-9 ly imprisoned, restrained, and struck plaintiff in and about the face, head and other parts of the body, and made other multiple 11 physical abuses and injuries to plaintiff which required plaintiff 12 to go to the hospital for care and treatment.

VIII

Such restraint of plaintiff's liberty was made without arrest, without warrant or other legal process and was unlawful, in that no crime had been committed and in that there was no reason or cause for belief that plaintiff had committed any crime.

IX

In doing all the acts and things aforesaid defendants, and each of them, acted wilfully and maliciously.

X

Plaintiff was restrained of his liberty by being handcuffed 23 and held incommunicado in a room in the United States Post Office for about one hour, after which time plaintiff was released in the custody of defendants FPS OFFICER CHASTAINE and LUV OFFICER GREER. Ronald Reagan-2887

XI

Defendants FPS OFFICER JAMES CHASTAINE and LUV OFFICER GREER 29 forcibly took plaintiff from the United States Post Office and forcibly took plaintiff to his business automobile parked in a private parking lot one block away. Plaintiff was menaced by said defendants, and each of them, for some time at plaintiff's busi1 | ness automobile. Plaintiff was made to fear for his continued personal safety from deadly weapons or fists, and fear for the personal safety of innocent by-standers. Plaintiff was not arrested.

XII

That by reason of said acts plaintiff was placed in great fear for his life and physical well being, and the lives and physical well being of innocent by-standers, defendants at all times having the present ability to continue to beat, strangle, handcuff, restrain, attack, and otherwise carry out their threats to 11 kill plaintiff, acting under color of authority and pretense of law.

XIII

The acts of defendants, under color of law, and under color of their authority as federal police officers of the UNITED STATES GOVERNMENT, as herein set out, deprived plaintiff of the privileges and immunities guaranteed to plaintiff as a citizen of the United States, by Amendments I, IV, V, VI, VII, and XIV of the Constitution of the United States.

XIV

That defendants, and each of them, and with others, knowingly and willfully and maliciously organized and caused to be organized conspiracy and agreement among themselves, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting, attacking, beating, and attempting to murder plaintiff under color of authority and pretense of law.

Ronald Reagan-2888

That defendants, and each of the, did the acts and things herein alleged pursuant to, and infurtherance of, the conspiracy and agreement herein set forth, and hereinafter and hereinbefore complained of as incorporated in all causes of action herein,

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and under color of authority and pretense of law, deprived plaintiff of the privileges and immunities guaranteed to plaintiff by Amendments I, VI, V, VI, VII, and MIV of the Constitution of the United States.

ROZI

By reason of the wrongful, intentional, willful, and malicious acts of defendants, and each of them, and the wounds and fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured 10 in mind and body and earning capacity, and for these reasons of malice, oppression, and ill will, and humiliation of plaintiff, plaintiff is entitled to and asks for punitive or exemplary damages 13 which shall be proved at trial, and as incorporated herein under 14 DAMAGES on page 274.

XVII

Prior to said wrongfulland unlawful beating of plaintiff and 17 restraint of plaintiff's liberty, plaintiff had enjoyed a good 18 reputation in and about the City of Sacramento, particularly for 19 honesty and good conduct.

XVIII

That by reason of the injuries inflicted by defendants, and each of them, plaintiff was compelled to and did expend sums for 23 medical care and the employment of physicians and surgeons; by virtue of which plaintiff has incurred debts in amounts to be 25 proved at trial, which sums were necessary, reasonable and proper.

XIX

That by reason of the injuries inflicted upon plaintiff by 28 defendants, and each of them, plaintiff will continue to suffer 29 great pain and anguish of body and mind, and permanent disfigure-30 ment, the sum of which shall be proved at trial.

#### Ronald Reagan-2889

WHEREFORE, plaintiff demands judgment against defendants,

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and each of them, in the sum and costs which shall be proved at trial, and compensatory and punitive damages, and such other relief as deemed just and proper by this Court.

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# FIFTY-THIRD CAUSE OF ACTION

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Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in Paragraphs I through VI, JURISDIC-TION (page 2); 28 USC 551343,1346(b); 42 USC 51981 et seq.; Amendments I, IV, V, VI, VII and XIV to the United States Constitution

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein complained of for deprivations of privileges and immunities under color of authority and pretense of law; United States is a party.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars (\$10,000.00).

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

# Defendants are:

- 1. Def. STATE OF CALIFORNIA, STATE CONTROLLER HOUSTON I. FLOURNOY, State Capitol, Sacramento, California.
- 2. Def. STATE OF CALIFORNIA, STATE ATTORNEY GENERAL EVELLE J. YOUNGER, 555 Capitol Mall, Sacramento, California.
- 3. Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE, CHIEF GUY R. CATES, State Capitol, Sacramento, California. Ronald Reagan-2890

provocation and under color of authority and pretense of law,

wrongfully, unlawfully, intentionally, and violently assaulted

plaintiff with deadly weapons on private business property where

the STATE OF CALIFORNIA had no business. Defendants, and each of

them, sent state agents and employees in two (2) cars to willful-

ly, maliciously, unlawfully, and violently use force on plaintiff.

Defendants agents and employees trespassed on private business

dants agents and employees returned to their automobiles and

property and restrained plaintiff from leaving building. Defen-

sat in the cars for some time in front of the building, assault-

ing, humiliating, restraining, outraging, and embarrasing plain-

tiff, and prevented plaintiff from conducting his lawful business

Such restraint ot plaintiff's liberty was made without war-

That defendants, and each of them, knowingly and willfully

Ronald Reagan-2891

VII

VIII

On or about January 23, 1974, defendants, without cause or

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activities.

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18 rant or other legal process and was unlawful, in that no crime 19 had been committed and in that there was no reason or cause for

20 belief that plaintiff had committed any crime.

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23 organized and caused to be organized conspiracy and agreement

24 among themselves, and each of them, and with others, to suppress

25 and wrongfully withhold from law enforcement plaintiff's new life-

26 saving firearms and related technologies, by illegally restrain-

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ing plaintiff.

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In doing all the acts and things aforesaid defendants, and each of them, acted willfully and maliciously, and in ill will.

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Defendants restrained plaintiff's liberty for some time.

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Prior to said restraint of plaintiff's liberty by defendants' ill will toward plaintiff, and the public humiliation to plaintiff, plaintiff had enjoyed a good reputation in and about the CITY OF SACRAMENTO, particularly for honesty and good conduct.

#### KII

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies, by illegally restraining plaintiff.

# XIII

That defendants, and each of them, did the acts and things herein set furth pursuant to, and in furtherance of, the coaspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, in malice, ill will, acting under color of authority and pretense of law, the result of which was invasion of plain tiff's guaranteed privileges and immunities from police harassment and abuse set forth in Amendments I, IV, V, VI, VII and KIV.

# VIV

Ey reason of the wrongful, intentional, malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, and nature and extent of wheih shall be proved at trial, incorporating herein DAMAGES, page 274. Ronald Reagan-2892

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such 32 Nother relief as is deemed just and proper by this Court.

# FIFTY-FOURTH CAUSE OF ACTION

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Plaintiff does hereby incorporate and adopt by reference, 4 all allegations set forth in Paragraph I through VI, JURRISDIC-TION (page 2); Title 23, United States Code, Secs. 1343,1346(b); Title 42, United States Code, Secs. 1931 et seg.; Amendments I, IV. V. VI, VII and XIV to the United States Constitution.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein complained of for deprivations of privileges and immunities under color of authority and pretense of law.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars, exclusive of interest and costs.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and 20 therefore sues these defendants, and each of them, by such ficti-21 tious names for damages caused and proximately caused to plaintiff

# Defendants are:

- 1. Def. STATE OF CALIFORNIA, STATE CONTROLLER HOUSTON I. 25 | FLOURNOY, State Capitol, Sacramento, California.
- 2. Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE, CHIEF 27 GUY R. OATES, State Capitol, Sacramento, California.
- 3. Def. STATEOF CALIFORNIA, ATTORNEY GENERAL EVELLE J. YOUNG 28 29 ER, 555 Capitol Mall, Sacramento, California.
- 4. Def. STATEOF CALIFORNIA, STATE POLICE OFFICERS unknown 30 Ronald Reagan-2893 31 to plaintiff.

VΞ

On or about Tebruary 8, 1974, defendants, without cause or provocation and under color of authority and pretense of law, wrongfully, unlawfully, intentionally, and violently assaulted plaintiff with deadly weapons in the California State Capitol. Desendants CALIFORNIA STATE POLICE restrained plaintiff of his liberty in the Capitol and refused to permit plaintiff to leave the offices of defendant STATE POLICE when plaintiff demanded to be allowed to leave the office. Said defendants refused to permit plaintiff to exercise his right to freedom of speech, due process of law, and the right of plaintiff to conduct plaintiff's lawful business in a lawful manner in the State Capitol. Defendants intimidated and interferred with plaintiff under the pretense of authority or law, and caused plaintiff to become so sick, ill and disheartened that plaintiff was caused to leave the Capitol without completing plaintiff's lawful business.

TII

Such restraint of plaintiff's liberty was made without war-20 | rant or other legal process and was unlawful, in that no crime 21 had been committed and in that there was no reason or cause for belief that plaintiff had committed any crime.

TIII

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement 26 among themselves, and each of them, and with others, to suppress 27 and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies, by illegally restraining plaintiff. Ronald Reagan-2894

In doing all the acts and things aforesaid, defendants, and each of them, acted villfully and maliciously, and in ill will.

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Defendants restrained plaintiff's liberty for about one hour.

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IX

Prior to said restraint of plaintiff's liberty by defendants' ill will toward plaintiff, and the public humiliation to plaintiff, plaintiff had enjoyed a good reputation in and about the CITY OF SACRAMENTO, particularly for honesty and good conduct.

KII

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies, by illegally restraining plaintiff.

XIII

That defendants, and each of them, did the acts and things 18 herein set forth pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, in malice, ill will, acting under color of authority and pretense of law, the result of which was invasion of plain tiff's guaranteed privileges and immunities from police harassment and abuse set forth in Amendments I, IV, V, VI, VII and XIV.

XIV

By reason of the wrongful, intentional, malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in 29 mind and body and earning capacity, the nature and extent of which 30 shall be provedat trial, and as incorporated herein under DAMAGES Ronald Reagan-2895 31 ||from page 274.

THEREFORE, plaintiff demands judgment against defendants, and each of them, the sum and costs of which shall be proved at this, and for compansatory and punitive demages, and for such other relief as is deemed just and proper by this Court.

# FIFTY-FIFTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in Paragraphs I-VI, JURISDICTION (page 2); 28 USC \$51343,1346(b); 42 USC \$1931 et seq.; and Amendments I, IV, V, VI, VII and KIV to the United States Constitution.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein complained of for deprivations of privileges and immunities under color of authority and pretense of law.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars.

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plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

# Defendants are:

- 1. Def. STATE OF CALIFORNIA, STATE ATTORNEY GENERAL EVELLE J. YOUNGER, 555 Capitol Mall, Sacramento, California.
- 2. Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE, CHIEF GUY R. OATES, State Capitol, Sacramento, California.

VI

On or about September 29, 1972, defendants, without cause or provocation and under color of authority and pretense of law, wrongfully, unlawfully, intentionally, maliciously, and violently assaulted plaintiff with deadly weapons in the United States Post Office, 301 I Street, Sacramento, California. Defendants restrained plaintiff of his liberty, obstructed plaintiff in the conduct of plaintiff's business, harassed, abused, intimidated, embarrassed, humiliated, and interferred with plaintiff.

VII

Such restraint of plaintiff's liberty was made without warrant or other legal process and was unlawful, in that no crime had been committed and in that there was no reason or cause for belief that plaintiff had committed any crime.

#### VIII

In doing all the acts and things aforesaid defendants, and each of them, acted willfully and maliciously, and in ill will.

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement 21 among themselves, and each of them, and with others, to suppress 22 and wrongfully withhold from law enforcement plaintiff's new life-23 saving firearms and related technologies, by illegally restraining plaintiff.

X

Defendants, and each of them, restrained plaintiff's liberty 27 for approximately one-half hour.

Ronald Reagan-2897

Prior to said restraint of plaintiff's liberty by defendants ill will toward plaintiff, and the public humiliation to plaintiff, plaintiff had enjoyed a good reputation in and about the CITY OF SACRAMENTO, particularly for honesty and good conduct.

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KII

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to illegally restrain plaintiff and suppress plaintiff's technologies.

XILI

That defendants, and each of them, did the acts and things herein set forth pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, in malice, ill will, and acting under color of authority and pretense of law, the result of which was invasion of plaintiff's guaranteed privileges and immunities from police harassment and abuse set forth in Amendments I, VI. V, VI, VII, "IV and 14 XIV of the United States Constitution.

XIV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XV

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

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#### FIFTY-SIXTH CAUSE OF ACTION

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly \$5 1982,1983,1985,1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title
28, United States Code, Secs. 1331 and 1343, this being a suit in
equity authorized by law; Title 42, United States Code, Sec. 1983,
to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation
under color of statute, ordinance, regulation, custom or useage
of a State of rights, privileges, and immunities secured by the
Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those
secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States
Constitution. The matter in controversy, exclusive of interest
and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).
Ronald Reagan-2899

III -A

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

of the privileges and immunities grammabled to plainties by Americants I. IV. V. VI. VII. and HIV of the Constitution of the United States.

# III - 3

Plaintill does hamely incomporate and adopt by reference, all allegations set forth in JUNISDECTION (page 2); Title 23, USC, Sections 1343 and 1246(b); Title 42, USC, Section 1931 et seq.; Amendments I.IV.V.VI.VII. and XIV to the United States Constitution.

# III - C

Plaintiff does hereby incorporate and edept by reference, all allogations set forth in all comes of action herein, herein-after and hereinherers complained of, for deprivations of privileges and immunities under color of authority and prateurs of law.

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Plaintiff BROWSOW is a citizen of the united states, and the UNITED STATES IS A PARTY to this controversy.

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

### Defendants are:

- Def. FEDERAL BUREAU OF INVESTIGATION (FBI), United States Department of Justice, headquarters Washington, D.C. Local address is 2300 Cottage Way, Sacramento, California.
  - Def. FBI DIRECTOR L. PATRICK GRAY, washington, D.C.
- Def. JOHN REED, FBI SPECIAL-AGENT-IN-CHARGE, 2300 Cottage Way, Sacramento, California.
- 4. Other FEDERAL BUREAU OF INVESTIGATION AGENTS not known to plaintiff. Ronald Reagan-2901

VII

On or about September 30, 1972, defendants FEI, under color of authority and pretense of law, and armed with deadly weapons, forcibly, loudly, repeatedly banged on business door, maliciously, wantonly, willfully, recklessly, wrongfully, unlawfully, and with-26 out cause or provocation, trespassed on private business property to assault plaintiff, and restrained plaintiff from leaving the business property. Defendants FDI agents and employees sat in at automobile for some time preventing plaintiff from leaving for 30 fear plaintiff would suffer bodily harm.

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Such restraint of plaintiff's likerty was made without arrest,

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1 without warrant or other legal process and was unlawful, in that 2 no crime had been committed and in that there was no reason or cause for belief that plaintiff had committed any crime.

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That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally 10 |restraining plaintiff.

X

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy 14 and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law, in malice, ill will and without reasonable cause, the result 17 of which was invasion of plaintiff's guaranteed privileges and 18 immunities from police harassment and abuse set forth in Amend-19 ments I, IV, V, VI, VII and KIV of the United States Constitution.

IX

Defendants, and each of the, restrained plaintiff's liberty Ronald Reagan-2902

XII

By reason of the wrongful, intentional, malicious acts, con-25 spiracies and humiliations of plaintiff by defendants, and each of 26 them, and others, the fright thereby caused plaintiff to suffer 27 extreme and severe mental anguish and physical pain, and injury 28 to mind and body and earning capacity, and the nature and extent 29 of which shall be proved at trial.

KIII

Prior to said restraint of plaintiff's liberty by defendants ill will toward plaintiff, and the public humiliation to plain-

- 149 -

1 tiff, plaintiff had enjoyed a good reputation in and about the CITY OF SACRAMENTS, particularly for honesty and good conduct. WHEREFORE, plaintiff demands judgment against delendants,

and each of them, the sum and costs of which shall be proved at trial, and for companiatory and punitive damages, and for such other relief as is deemed just and proper by this Court, and as incorporated herein under DAMAGES from page 274.

ORIGINAL

#### FIFTY-SEVENTY CAUSE OF ACTION

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The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly 55. 1982,1983,1985,1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

TT

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or useage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00). Ronald Reagan-2904

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

of the privileges and immunities guaranteed to plaintiff by Amendments I, IV, V, VI, VII, and KIV of the Constitution of the United States.

#### III - B

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 23, USC, Sections 1343 and 1346(b); Title 42, USC, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and XIV to the United States Constitution.

# III - C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all cames of action herein, hereinafter and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pretense of law.

IV

Plaintiff PROMSON is a citizen of the United States, and the UNITED STATES is a party to this controversy.

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUMDRED, and therefore sugs these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

#### Defendants are:

- 1. Def. FEDERAL BUREAU OF INVESTIGATION (FBI), United States Department of Justice, headquarters Washington, D.C. Local address is 2800 Cottage Way, Sacramento, California.
  - 2. Def. FBI DIRECTOR L. PATRICK GRAY, Washington, D.C.
- 3. Def. JOHN REED, FBI SPECIAL AGENT-IN-CHARGE, 2800 Cottage Way, Sacramento, California; agent "TCMMY RAY".
  - 4. Other FBI agents not known to plaintiff.

### VII

On or about October 4, 1972, defendants FBI, under color of authority and pretense of law, and armed with deadly weapons, and each of them, without cause or provocation, wrongfully, maliciously, wantonly, willfully, recklessly, harassed, abused, intimidated, embarrassed, obstructed, humiliated, restrained, and otherwise interferred with plaintiff in the United States Post Office, 3th and I Streets, Sacramento, and stopped plaintiff in plaintiff's conduct of plaintiff's lawful business in the Post Ronald Reagan-2906 Office.

#### VIII

Plaintiff was obstructed from leaving the Post Office as he 32 wished by said two (2) FBI agents, acting under color of authority

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and pretense of law. When plaintiff managed to get away from the FBI restraint in the Post Office, defendant's FBI agent "TOMMY RAY" stalked and "dogged" plaintiff down the streeto to Sacramento City Hall, followed plaintiff up the stairs and into the City Hall building. Agent "RAY" refused to not follow plaintiff.

IK

Such restraint of plaintiff's liberty was made without warrant or other legal process and was unlawful, in that no crime had been committed and in that there was no reason or cause for belief that plaintiff had committed any crime.

X

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving sfirearms and related technologies, by illegally restraining plaintiff.

KI

Defendants, and each of them, restrained plaintiff's liberty for approximately one-half hour. in the Post Office.

XII

In doing all the acts and things aforesaid defendants, and each of them, acted willfully and maliciously, and in ill will.

KIII

Prior to said restraint of plaintiff's liberty by defendants' ill will toward plaintiff, and the public humiliation to plaintiff, plaintiff had enjoyed a good reputation in and about the CITY OF SACRAMENTO, particularly for honesty and good conduct.

Ronald Reagan-2907

That defendants, and each of them, did the conspiracies, acts and things herein set forth pursuant to, and in furtherance of, the conspiracy and agreement herein, and hereinafter and here-

inhefore complained of, in malice, ill will, and acting under

color of authority and pretense of law, the result of which was

invasion of plaintiff's guaranteed privileges and immunities from

police harassment and abuse set forth in Amendments I, IV, V, VI,

VII and XIV of the Constitution of the United States.

XV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and incorporated herein under DANAGES from page 274.

XVI

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

#### FIFTY-EIGHTH CAUSE OF ACTION

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Code, Secs. 1331 et seq.

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The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly 55. 1982,1983,1985,1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or useage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

# III -A

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff Ronald Reagan-2909

- 156 -

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of the privileges and immunities guaranteed to plaintiff by

Amendments I, IV, V, VI, VII, and XIV of the Constitution of the

United States.

#### III - B

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28, USC, Sections 1343 and 1346(b); Title 42, USC, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and XIV to the United States Constitution.

# III - C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinafter and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pretense of law.

# Ronald Reagan-2911

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IV

Plaintiff BROWSON is a citizen of the United States, and the United States is a party to this controversy.

77

Plaintiff does not know the true names and capacities ofdefendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

# Defendants are:

- Def. FEDERAL BUREAU OF INVESTIGATION.
- 2. Def. FBI DIRECTOR L. PATRICT GRAY.
- 3. Def. JOHN REED, FBI SPECIAL AGENT-IN-CHARGE, Sacramento.
- 4. Def. WILLIAM J. KINNEY, CHIEF OF CITY OF SACRAMENTO POLICE DEPARTMENT.
  - 5. Other FBI agents, and others, not known to plaintiff.

VII

On or about October 4, 1972, defendants FBI, under color of authority and pretense of law, and armed with drawn deadly weapons (handguns, rifles, etc.), withoutcause or provocation, retaliated against plaintiff for plaintiff's insistance that the FBI immediately stop harassment and abuse of Plaintiff BRONSON.

FBI AGENT JOHN REED, and other agents, trespassed on private business property and forcibly, violently, loudly, wrongfully, unlawfully, maliciously and wantonly, "surrounded the building in which plaintiff was conducting business. Defendants FBI forcibly and repeatedly banged on the door, yelled out loud to plaintiff their threats of bodily harm, incessantly forced the telephone to ring, and ran all around the building, behind their cars, into the streets and alleys.

VIII

Plaintiff's liberty was restrained in this humiliating

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manner for several hours.

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Such restraint of plaintiff's liberty was made without warrant or other legal process and was unlawful, in that no crime had been committed and in that there was no reason or cause for belief that plaintiff had committed any crime. PLAINTIFF WAS NOT AND NEVER HAS BEEN ARRESTED.

Х

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies, by illegally restraining plaintiff. Ronald Reagan-2912

XI

In doing all the acts and things aforesaid defendants, and each of them, acted willfully and maliciously, and in ill will.

XII

Prior to said restraint of plaintiff's liberty by defendants! ill will toward plaintiff, and the public humiliation to plaintiff, plaintiff had enjoyed a good reputation in and about the CITY OF SACRAMENTO, particularly for honesty and good conduct.

KIII

That defendants, and each of them, did the conspiracies, acts and things herein set forth pursuant to, and in furtherance of, the conspiracy and agreement herein, and hereinafter and hereinbefore complained of, in malice, ill will, and acting under color of authority and pretense of law, the result of which was 32 invasion of plaintiff's guaranteed privileges and immunities from police harassment and abuse set forth in Amendments I, IV, V, VI, VII and MIV of the United States Constitution.

KIV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nasure and extent of which shall be proved as trial, and as incorporated herein under DAWAGES from page 274.

XV

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

# FIFTY-NINTH CAUSE OF ACTION

I

The Court has jurisdiction in this matter under corrupt practices clauses of the Federal Election Campaign Act of 1971, as amended in 1972, 1974, and Federal Corrupt Practices Act, 22 Title 18 of the United States Code (Annotated), especially Sections 610, et seq., and the California Political Reform Act of 1974, Title 9 of the Government Code, Sections 81000 et seg.

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II

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly 55. 1982,1983,1985,1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

III

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or useage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

IV -A

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

- Rohald Reagan-2914

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of the privileges and immunities guaranteed to plaintiff by Amendments I, TV, V, VI, VII, and XIV of the Constitution of the United States.

# IV . - B

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28, USC, Sections 1343 and 1346(b); Title 42, USC, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and XIV to the United States Constitution.

#### IVE - C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, herein-after and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pretense of law.

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Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars.

V

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, AND therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VII

Defendants are:

- 1. Def. STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, Jr., State Capitol, Sacramento, California.
- 2. Def. STATE OF CALIFORNIA, STATE ATTORNEY GENERAL EVELLE J. YOUNGER, 555 Capitol Mall, Sacramento, California.
- 3. Def. STATE OF CALIFORNIA, STATE POLICE, STATE POLICE CHIEF GUY R. CATES, State Capitol, Sacramento, California.
- 4. Def. STATE OF CALIFORNIA, STATE POLICE OFFICER L.D. SHERWOOD (BADGE NO. 4), State Capitol, Sacramento, California.
- 5. Def. STATE OF CALIFORNIA, STATE POLICE OFFICER S.W. WESTON, State Capitol, Sacramento, California.

# Ronald Reagan-2916

VIII

On February 11, 1977, defendants, and each of them, wrong-fully, willfully, unlawfully, and maliciously took part in active, politically corrupt practices against plaintiff in criminal attempts to coverup GOVERNOR EDMUND G. BROWN's coverup of Brown Administration scandals known to plaintiff in said Defendant GOVERNOR BROWN's bids for election to the Office of President of the United States and reelection to Office of Governor of the

# Ronald Reagan-2917

State of California. Without provocation or cause, and acting under color of authority and pretense of law, defendants retaliated against plaintiff for filing this lawsuit before this Court, and instituted and completed defendant MARC POCHE's threats of bodily harm toward plaintiff while plaintiff lawfully attended an administrative hearing at 1006 Fourth Street, Sacramento, CA. Said defendants, and each of them, wrongfully, unlawfully, maliciously, and contemptuously, under color of authority and pretense of law, used defendants armed CALIFORNIA STATE POLICE OFFI-CERS L.D. SHERWOOD and S.W. WESTON, and others not known to plaintiff, to deprive plaintiff and others of privileges and immunities guaranteed to plaintiff as a citizen of the United States, by Amendments, I, IV, V, VI, VII, and XIV of the United States Constitution, and the Due Process and Equal Protection Caluses of the Fourteenth Amendment. Defendants, and each of them, interferred with party to this Court proceeding by assaulting and restraining plaintiff and others before, during and after the administrative hearing. Said defendants, and each of them, in contempt for judicial and administrative proceedings and parties, "dogged", followed, stalked, obstructed, harassed, abused, restrained, assaulted, and otherwise wrongfully intimidated and pursued plaintiff and others with deadly weapons, preventing plain-22 tiff and others from peaceful lawful assembly, presence and attendance at said administrative hearing. Plaintiff and others were deprived of their rights and not permitted to conduct business affairs before the administrative hearing as plaintiff intended and as provided by law. The preventing of plaintiff to conduct business before the administrative hearing occurred in a corrupt political retaliation against plaintiff by GOVERNOR BROWN under color of authority and pretense of law.

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1 | rant or other legal process and was unlawful, in that no crime had been committed and in that there was no reason or cause for belief that plaintiff had committed any crime.

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That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies, by illegally restraining plaintiff.

KI

Defendants, and each of them, restrained Plaintiff's liberty for approximately two(2) hours.

KII

In doing all the acts and things aforesaid defendants, and each of them, acted willfully and maliciously, and in ill will.

KIII

Prior to said restraint of plaintiff's liberty by defendants ill will toward plaintiff, and the public humiliation to plaintiff, plaintiff had enjoyed a good reputation in and about the CITY OF SACRAMENTO, particularly for honesty and good conduct. Ronald Reagan-2918

That defendants, and each of them, did the conspiracies, acts and things herein set forth pursuant to, and in furtherance of, the conspiracy and agreement herein, and hereinafter and hereinbefore complained of, and the conspiracy and agreement herein to get defendant GOVERNOR BROWN elected President and reelected Governor by by covering up Brown Administration scandals and crimes, in malice, ill will, and acting under color of authority and precense of law, the result of which was invasion and re-

- 165 -

straint of plaintiff's guaranteed privileges and immunities from

corrupt campaign political practices and police harassment and

abuse set forth in Amendments I, IV, V, VII, and KIV of the United States Constitution, and the Equal Protection and Due Process
Clauses of the Fourteenth Amendment.

XV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XVI

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, sutent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

# SIXTIETH CAUSE OF ACTION

The Court has jurisdiction in this matter under Title 28, 3 United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly \$5: 1982,1983,1985,1986, interference with Civil Rights; redress for 11 violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.; Federal Tort Claims Act.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or useage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff -167 Ronald Reagan-2920

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of the privileges and immunities guaranteed to plaintiff by Amendments I, IV, VI, VII, and XIV to the United States Constitution.

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Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars; U.S. a party.

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUMDRED, and therefore ques these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff

VI -A

# Defendants are:

- 1. Def. FEDERAL PROTECTIVE SERVICE (FPS) of the UNITED STATES GENERAL SERVICES ADMINISTRATION (GSA). Headquarters of the GSA are Washington, D.C. Local headquarters of the FEDERAL PROTECTIVE SERVICE (FPS) is 650 Capitol Mall, Sacramento, California.
- 2. Defs. OFFICER CLEMONS (BADGE 3327), OFFICER JAMES CHAS-TAINE, and CLARENCE SNELSON, uniformed agents and employees of the Sacramento FEDERAL PROTECTIVE SERVICE office.
- 3. Defs. OFFICER GREER and OFFICER W.W. SMITH (BADGE 30), uniformed agents and employees of LUV SECURITY SERVICE, Sacramento,
- 4. Def. LUV SECURITY SERVICE, Sacramento, California, under contract to the defendant FEDERAL PROTECTIVE SERVICE to perform services as contracted. Represented in Sacramento, California 25 by attorney Michael Sands.
  - 5. Defs. FEDERAL BUREAU OF INVESTIGATION and DIRECTOR L. PATRICK GRAY, headquartered in Washington, D.C., with local adiress of 2800 Cottage Way, Sacramento, California.
    - 6. Def. "VICTOR MARTINEZ".
    - 7. Other defendants not known to plaintiff.

E- IV

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 of the United States Code, Sections 1343 and 1346(b); Title 42 of the United States Code, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and XIV to the Constitution of the United States.

VI -C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinafter and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pretense of law.

On August 22, 1975, in the United States Post Office, 301

I Street, Sacramento, California, plaintiff filed charges of unlawful, wrongful, malicious and Willful harassment and assault of
plaintiff in the Post Office by defendant "VICTOR NERGINER" with
defendant TECTRIL PROTECTIVE SIMPLOE officers on duty, defendant
OFFICERS CHARRENT AND CLANCUS. Then plaintiff returned to the
Post Office with documents as requested by defendants FPS OFFICERS,
plaintiff was suddenly, negligently, and without warning, cause
or provocation, attacked, beaten, handouffed, strangled, and
restrained by defendant FPS OFFICERS CHASTAINE, CLEMONS, SMITH,
AND GREER.

# VII-B

Plaintiff's injuries in the Post Office were the result of the negligence of the defendant, its agents and employees, causing serious, severe and permanent injuries to plaintiff, the nature and extent of which shall be proved at trial.

#### WII-C

At the time of the wrongful, unlawful, willful, malicious, conspiratorial, unprovoked attack on plaintiff, defendant FPS OFFICERS were under the sole and exclusive management and control of the defendant, its agents and servants, and plaintiff is without knowledge as to the precise negligent acts or omissions to acts causing plaintiff's injuries.

# VII-D

The malicious and wanton attacks on plaintiff were acts of gross negligence or willful or wanton misconduct, and were caused solely and exclusively by reason of the negligence of the defendant herein, its agents, servants, or employees and was due in no manner whatsoever to any act or failure to act on the part of the plaintiff herein. Ronald Reagan-2923

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#### VII-E

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That on August 22, 1975, in the County of Sacramento, United States Post Office, 301 I Street, Sacramento, California, defendants, and each of them, under color of authority and pretense of law, and armed with deadly weapons, and each of them, maliciously, negligently, wantonly, willfully, recklessly, wrongfully, unlawfully, and without cause or provocation, violently attacked, beat, strangled, handcuffed, illegally search and seized, falsely arrested, falsely imprisoned, restrained, and struck plaintiff in and about the face, head and other parts of the body, and made other multiple physical abuses and injuries to plaintiff which required plaintiff 11 to go to the hospital for care and treatment.

#### VIII

negligent Such restraint of plaintiff's liberty was made without arrest without warrant or other legal process and was unlawful, in that no crime had been committed and in that there was no reason or cause for belief that plaintiff had committed any crime.

IX

In doing all the acts and things aforesaid defendants, and each of them, acted wilfully and maliciously, grossly, wantonly.

negligently Plaintiff was/restrained of his liberty by being handcuffed and held incommunicado in a room in the United States Post Office for about one hour, after which time plaintiff was released in the custody of defendants FPS OFFICER CHASTAINE and LUV OFFICER GREER. Ronald Reagan-2924

XT

Defendants FPS OFFICER JAMES CHASTAINE and LUV OFFICER GREER and negligently forcibly/took plaintiff from the United States Post Office and forcibly took plaintiff to his business automobile parked in lacktrianglePlaintiff was menaced by said 31 ||private parking lot one block away. defendants, and each of them, for some time at plaintiff's busi-

- 171 -

ness automobile. Plaintiff was made to fear for his continued negligently used personal safety from/deadly weapons or fists, and fear for the personal safety of innocent by-standers. Plaintiff was not arrested.

XII

negligently
That by reason of said acts plaintiff was placed in great

fear for his life and physical well being, and the lives and physical well being of innocent by-standers, defendants at all times

having the present ability to continue to beat, strangle, hand
cuff, restrain, attack, and otherwise carry out their threats to

kill plaintiff, acting under color of authority and pretense of

law.

XIII

The acts of defendants, under color of law, and under color of their authority as federal police officers of the UNITED STATES negligently

GOVERNMENT, as herein set out,/deprived plaintiff of the privileges and immunities guaranteed to plaintiff as a citizen of the United States, by Amendments I, IV, V, VI, VII, and XIV of the Constitution of the United States.

XIV

That defendants, and each of the, and with others, knowingly negligently, and willfully/and maliciously organized and caused to be organized conspiracy and agreement among themselves, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting, attacking, beating, and attempting to murder plaintiff under color of authority and pretense of law.Ronald Reagan-2925

XV.

negligent
That defendants, and each of the, did the acts and things
herein alleged pursuant to, and infurtherance of, the conspiracy
and agreement herein set forth, and hereinafter and hereinbefore
complained of as incorporated in all causes of action herein. The

foregoing wrongful conspiracies and acts done by defendants, and each of them, meant that defendant(s) were not immune from prosecution (28 USC \$2680(h)) because defendant(s) were operating within scope of employment and did not use due care toward plaintiff as provided in 28 USC \$2680(a) and plaintiff was injured.

negligent,
By reason of the wrongful, /intentional, willful, and malicious acts of defendants, and each of them, and the wounds and
fright thereby caused plaintiff, plaintiff has suffered extreme
and severe mental anguish and physical pain, and has been injured
in mind and body and earning capacity, and for these reasons of
negligence
malice, oppression, and ill will, and humiliation of plaintiff,
plaintiff is entitled to and asks for punitive or exemplary damages
which shall be proved at trial, and as incorporated herein under
DAMAGES on page

XVII

negligent
Prior to said wrongful/and.unlawful beating of plaintiff and
restraint of plaintiff's liberty, plaintiff had enjoyed a good
reputation in and about the City of Sacramento, particularly for
honesty, and good conduct.

XVIII

That by reason of the injuries inflicted by defendants, and each of them, plaintiff was compelled to and did expend sums for medical care and the employment of physicians and surgeons; by virtue of which plaintiff has incurred debts in amounts to be proved at trial, which sums were necessary, reasonable and proper.

XXX

negligently
That by reason of the injuries/inflicted upon plaintiff by
defendants, and each of them, plaintiff will continue to suffer
great pain and anguish of body and mind, and permanent disfigurement, the sum of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

Ronald Reagan-2927

## SIXTY-FIRST CAUSE OF ACTION

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The Court has jurisdiction in this matter under Title 28,

United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly \$5.1932,1933,1935,1936, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or useage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

#### III -A

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

= 178onald Reagan-2928

of the privileges and immunities guaranteed to plaintiff by Amend-ments I, IV, V, VI, VII, and XIV to the United States Constitution.

III -B

Plaintiff does hareby incorporate and adopt by reference, all allegations set forth in JURISDICTICM (page 2): Title 28 of the United States Code, Sections 13/13 and 1346(b): Title 42 of the United States Code, Section 1981 et seq.: Amendments I, TV, V. VI, VII, and XIV to the Constitution of the United States.

III -C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, herein-after and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pretense of law.

Ronald Reagan-2929

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Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars, and the UNITED STATES is a party.

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Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

Each of the acts and conspiracies herein complained of in subparagraph IX are incorporated herein, hereinfafter, and hereinbefore, as causing the injuries and damages to plaintiff by the defendant, its agents, employees or servants.

VII

Each of said acts and conspiracies were done against plaintiff by defendant, its agents, employees or servants, acting under the sole and exclusive management and control of defendant, and in the course of their employment with defendant, its agents, employees and servants.

VIII

Each of said acts and conspiricies and things done were maliciously, willfully, wantonly, intentionally and negligently done against plaintiff by defendant, its agents, employees and servants, under the color of authority and pretense of law, without cause or provocation, in negligent acts or ommissions to acts causing plaintiff's injuries.

Ronald Reagan-2930

IX

The negligence and pattern of acts and conspiracies of defendant UNITED STATES GOVERNMENT, its agents, employees, and servants, have caused plaintiff serious, severe, and permanent injuries:

- 1. That on August 22, 1975, defendant agents, employees, and servants, FEDERAL PROTECTIVE SERVICE and OFFICERS CHASTAINE and CLEMONS, LUV SECURITY SERVICE and OFFICERS SMITH AND GREER, attacked, beat, restrained, imprisoned, handcuffed, strangled plaintiff in the Post Office.
- 2. That on April 15/24, 1974, May 3 and 4, 1974, Movember 5, 1975, June 4, 1977, February 25, 1978, defendant agents, employees, and servants sabotaged plaintiff's business equipment in order to maim or kill plaintiff.
- 3. That on August 26, 1973, defendant agents, employees, and servants, FEDERAL BUREAU OF INVESTIGATION, DIRECTOR CLARENCE M. KELLEY, in conspiracy with defendant AMERICAN TELEPHONE AND TELEGRAPH (ATT) AND PACIFIC TELEPHONE AND TELEGRAPH (PTT), agents, employees and servants, caused illegal wiretap to be placed on plaintiff's business telephone and threatened to maim or attempt to kill plaintiff when plaintiff demanded illegal wiretap be removed.
- 4. On 1973: 2/9,13;3/12-15;7/13;8/30,31;9/4,24;11/20; 1974: 1/10,16;2/7,28;5/8,14;11/14,8;12/6,7; 1975: 1/15;2/4,5,8,9,11; 4/21,22;7/8;9/9; 1976: 1/19,for examples, defendants FBI and ATT caused plaintiff's business telephone to "ring" incessantly.
- 5. On September 30, 1972, defendant agents, employees, and servants, FBI, DIRECTOR L. PATRICK GRAY, trespassed assaulted, and restrained plaintiff in private business building.
- 6. On October 4, 1972, defendants agents, employees, and servants, FEI and DIRECTOR L. PATRICK GRAY, assaulted and restrained plaintiff in the Post Office, and City Hall.

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- 7. On October 4, 1972, defendants agents, employees and ser vants, FBI, DIRECTOR GRAY, SP.AIC JOHN REED, violently traspassed, assaulted, threatened, and restrained plaintiff in private business property.
- 3. On August 27, 1976, defendant, agents, employees and servant, FBI, DIRECTOR CLARENCE KELLEY, in conspiracy with defendant SACRAMENTO MUNICIPAL UTILITY DISTRICT (SMUD), agent, employee or servant who threatened to beat plaintiff.
- On August 27, 1976 defendants, agents, employees and servants, FBI, DIRECTOR KELLEY and SMUD, violently assaulted and threatened plaintiff in furtherance of the conspiracy against plaintiff; retaliation for filing this lawsuit.
- 10. On May 22, 1973, defendants, agents, employees and servants, FBI and DIRECTOR RUCKELSHAUS, published a false, prejudicial and libelous letter concerning plaintiff and plaintiff's business.
- On or about 1971 to present, defendants, agents, employ-11. ees and servants, UNITED STATES ARMY, in conspiracy with WINCHES-TER ARMS/OLIN CORPORATION, REMINGTON ARMS/DUPONT CORP., NATIONAL RIFLE ASSOCIATION, caused to be published verbal and written false statements concerning the ARMY's analysis of plaintiff's United States Patent No. 3,543,528, "Rifle Forestock", and related technologies.
- 12. On or about August 21, 1972, defendants, agents, employees and servants, U.S. ATTORNEY GENERAL RICHARD G. KLEINDIENST, FBI, FBI DIRECTOR GRAY, SECRET SERVICE, IACP, and others, conspired and maliciously suppressed plaintiff's demands for Congressional Inquiry into said defendants criminal behavior, and each of 29 them, through California United States Senator Alan Cranston.
- 13. On or about October 4, 1972, defendants agents, employees and servants, AG KLEINDIENST, FBI DIRECTOR GRAY, FBI, SECRET 32 SERVICE, and others, conspired and maliciously suppressed plain-

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1 tiff's demands for investigation of said defendants criminal be-2 havior, and each of them, through H.R. HALDEMAN.

- 14. In 1972, defendants, agents, employees and servants, U.S. A.G. KLEINDIENST, FBI DIRECTOR GRAY, FBI, SECRET SERVICE, and others, conspired and maliciously suppressed plaintiff's demands for Congressional Inquiry into said defendants criminal behavior, and each of them, through the United States Senate Judiciary Committee.
- On or about January 18, 1973, defendants, agents, employees and servants, U.S.A.G. KLEINDIENST, FBI DIRECTOR GRAY, FBI, SECRET SERVICE, and others, conspired and maliciously suppressed plaintiff's demands for Congressional Inquiry into said defendants criminal behavior, and each of them, through United States Senate Judiciary Committee Chairman James O. Eastland.
- 16. On or about April 13, 1973, defendants, agents, employand servants, U.S.A.G. KLEINDIENST, FBI DIRECTOR GRAY, FBI, SECRET SERVICE, and others, conspired and maliciously suppressed plaintiff's demands for Department of Justice inquiry into said defendants criminal acts, and each of them, through United States 20 Attorney General RICHARD G. KLEINDIENST.
  - 17. On or about April 13, 1973, defendants, agents, employees and servants, U.S.A.G. KLEINDIENST, FBI DIRECTOR GRAY, FBI, SECRET SERVICE, and others, conspired and maliciously suppressed plaintiff's demands for Congressional Inquiry into said defendants criminal acts, and each of them, through the United States Senate Judiciary Committee.
- On April 28, 1973, defendants, agents, employees and servants, USAG KLEINDIENST, FBI DIRECTOR RUCKELSHAUS, FBI, SECRET SERVICE, and others, conspired and maliciously suppressed plain-30 tiff's demands for Executive Inquiry into said defendants criminal acts, and each of them, through the Office of the President.
  - 19. On or about May 1, 1973, defendants agents, employees

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1 and servants, UNITED STATES ATTORNEY GENERAL, FBI AND DIRECTOR, 2 SECRET SERVICE, and others, conspired and maliciously suppressed 3 plaintiff's demands for Executive Inquiry into said defendants criminal acts, and each of them, through the Office of the President, President RICHARD M. NIXON.

- 20. On or about March 1, 1974, defendants, agents, employees and servants, U.S. ATTORNEY GENERAL, FBI AND DIRECTOR KELLEY, SECRET SERVICE, and others, conspired and maliciously suppressed plaintiff's demands for Judicial Inquiry into said defendants criminal acts, and each of them, through the United States Chief Justice Warren E. Burger.
- 21. On or about April 17, 1974, defendants, agents, employees and servants, U.S. ATTORNEY GENERAL, FBI AND DIRECTOR KELLEY, SECRET SERVICE, and others, conspired and maliciously suppressed plaintiff's demands for Executive Inquiry into said defendants criminal acts, and each of them, through the Office of the Vice President, plaintiff protested attempted murder and sabotage.
- 22. On or about May 15, 1974, defendants, agents, employees and servants, U.S.ATTORNEY GENERAL, FBI AND DIRECTOR KELLEY. SECRET SERVICE, and others, conspired and maliciously suppressed plaintiff's continued demands for Executive Inquiry into said defendants criminal acts, and each of them, through the Office of the Vice President, in acknowledgement of the Vice President, GERALD R. FORD, personal letter to plaintiff of May 1, 1974.
- 23. On or about August 30, 1974, defendants, agents, employees and servants, U.S.ATTORNEY GENERAL, FBI AND DIRECTOR KELLEY, SECRET SERVICE, and others, and Watergate Special Prosecutor LEON JAWORSKI, conspired and maliciously suppressed plaintiff's filing of Principal Formal Legal Charges against RICHARD M. NIXON, U.S. ATTORNEY GENERAL WILLIAM B. SAXBE, and others, for failure to investigate defendants, and each of them, criminal acts which inclu-32 ded "criminal conspiracy; malfeasance in office; official miscon-

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duct; dereliction of duty; criminal negligence; attempted murder; illegal wiretaps; threats of mayhem and assault and battery; destruction of personal property; harassment and abuse; and illegal use of police power...", the result of which was President GERALD R. FORD's Pardon of RICHARD M. NIXON immediately, through JAWORSKI

- On or about September 8, 1974, defendants, agents, employ 24. ees and servants, U.S. ATTORNEY GENERAL SAXBE, FBI AND FBI DIREC-TOR KELLEY, SECRET SERVICE, LEON JAWORSKI, Watergate Special Prosecutor, and others, conspired and maliciously suppressed plaintiff's demand for Special Prosecutor inquiry into the Pardon of RICHARD M. NIXON and defendants criminal acts, and each of them, through the Watergate Special Prosecutor LEON JAWORSKI.
- 25. On or about October 9, 1974, defendants, agents, employees and servants, U.S. ATTORNEY GENERAL SAXBE, FBI AND FBI DIREC-TOR KELLEY, SECRET SERVICE, and others, conspired and maliciously suppressed plaintiff's demand for Judicial and Congressional Inquiry into the illegal Pardon of RICHARD M. NIXON which deprived plaintiff of his rights to Equal Protection and Due Process of Law Clauses of the Fourteenth Amendment to the Constitution of the United States, through the Offices of United States Chief Justice Warren E. Burger and United States House of Representatives Judiciary Committee Chairman William Hungate.
- 26. On or about August 23, 1973, defendant, its agents, employees or servants, FBI and FBI DIRECTOR CLARENCE M. KELLEY, illegally wiretapped and illegally disrupted and discontinued plaintiff's lawful business telephone conversation by the use of man identifying himself as "FBI Agent".
- 27. Following August 22, 1975 beating, strangulation, handcuffing, false imprisonment, restraing, etc., of plaintiff by def. FPS, its agents, employees or servants, ASST. U.S. ATTORNEY DONALD 31 HELLER refused to accept plaintiff's complaint for criminal acts in plaintiff's capacity of "complaining witness" for the United

States.

28. From 1972 forward, def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION, NIXON ADMINISTRATION OFFICIALS, STATE OF CALIFORNIA, CITY AND COUNTY OF LOS ANGELES, CITY AND COUNTY OF SACRAMENTO, and others, connived, conspired and collaborated in political federal funding blackmail to suppress plaintiff's technologies and earn (illegal) campaign contributions or support.

- 29. On or about April 28, 1973, NIXON ADMINISTRATION OFFI-CIALS, FBI, SECRET SERVICE, and WESTERN UNION, their employees, agents or servants, destroyed telegraphic message of plaintiff's.
- 30. On or about October 20, 1972, def. UNITED STATES ASST.
  ATTORNEY GENERAL HENRY E. PETERSEN, U.S. DEPARTMENT OF JUSTICE,
  FBI, libeled and slandered plaintiff in publishing of letter concerning plaintiff with false and prejudicial statements.

The foregoing wrongful conspiracies and acts done by defendants, and each of them, meant that defendants, and each of them, were not immune from prosecution (28 USC \$2680(h)) because defendants, and each of them, were operating within scope of employment and did not use due care toward plaintiff as provided in 28 USC \$2680(a) and plaintiff was injured.

Ronald Reagan-2936

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complained of.

Defendant(s) negligently and intentionally conducted themselves with such a knowing lack of care for the rights of plaintiff and others that defentant(s) were directly and proximately
responsible for the campaign conducted against plaintiff of fear,
intimidation, alarm, menace, duress, emotional distress, apprehension, invasion of privacy, wiretapping, tresspass, libel, slander, assault, battery, false imprisonment, restraint, illegal
search and seizure, and other violations of Civil Rights, and the

practice of fraud and deceit upon plaintiff, and all other unlaw-

## Ronald Reagan-2937

XI

ful acts under color of authority and pretense of law herein

Defendant(s) breach of duty and conduct in office has been so negligent and intentionally illegal so as to create an atmosphere permitting other law enforcement officials, agents, employees and servants, federal, state, county, and city, to do all illegal acts and things herein complained of, and hereinafter and hereinbefore complained of, against plaintiff without appropriate authorities stopping the illegal acts.

XII

To Plaintiff's knowledge, information and belief, defendant(s), their agents, employees or servants, conspiratorially refused to investigate crimes brought to the attention of appropriate defendant(s) by plaintiff. Defendant(s) instead chose to maintain this pattern and campaign against plaintiff of assault, battery, trespass, fear, intimidation, duress, alarm, emotional distress, invasion of privacy, trespass, libel, slander, violation of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping and search and seizure, and other acts herein complained of, in gross negligence or willful or wanton disregard to the sworn duties of each of them, under color of authority and pretense of

- 184 -

law. Plaintiff was prevented and deprived from doing business with defendants, and each of them.

XIII

Defendants, and each of them, owed plaintiff and others a duty to not intentionally, willfully and negligently inflict bodily harm or loss of property upon them, and owed plaintiff and others their sworn duty to protect plaintiff and others from bodily harm and property damage, and defendants, and each of them, intentionally and intentionally and negligently conspired to not perform that duty.

XIV

Defendant(s), its agents, employees and servants, and each of them, in doing the conspiracies and acts herein complained of, negligently, wantonly and willfully and maliciously violated their sworn oaths of office to uphold and defend the Constitution of the United States and the Constitution of the State of California to protect citizens (Cal.Const.Art.XX), under color of authority and pretense of law.

XV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XVI

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

Ronald Reagan-2938

#### SIXTY-SECOND CAUSE OF ACTION

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Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in Paragraph I through VI, JURRISDIC-TION (page 2); Title 23, United States Code, Secs. 1343,1346(b); Title 42, United States Code, Secs. 1981 et seq.; Amendments I, 7 IV, V, VI, VII and XIV to the United States Constitution.

II

Plaintiff does hereby incorporate and adopt by reference, 10 all allegations set forth in all causes of action herein complained of for deprivations of privileges and immunities under color of authroity and pretense of law.

Plaintiff is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars, exclusive of interests 16 and costs.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff

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# Defendants are:

- Def. STATE OF CALIFORNIA, STATE CONTROLLER HOUSTON I. 24 25 FLOURNOY, State Capitol, Sacramento, California.
- 2. Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE, CHIEF 26 GUY R. OATES, STATEPOLICE OFFICERS L.D. SHERWOOD, S.W. WESTON. 27
- 3. Def. STATEOF CALIFORNIA, ATTORNEY GENERAL EVELLE J. YOUNG 28 ER, 555 Capitol Mall, Sacramento, California. 29
  - 4. Def. STATEOF CALIFORNIA, OFFICE OF GOVERNOR, GOVERNOR : EDMUND G. BROWN, Jr., MARC POCHE.
    - 5. Def. STATE OF CALIFORNIA, GOVERNOR RONALD REAGAN (Former).

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Ronald Reagan-2939

- 186 -

The negligence and pattern of acts and conspiracies of defendant STATE OF CALIFORNIA, its agents, employees, and servants, have caused plaintiff serious, severe, and permanent injuries:

- 1. That in 1972 defendant agents and employees, ATTORNEY GENERAL EVELLE J. YOUNGER and J.C. HARRIS, threatened plaintiff with bodily harm and refused to investigate crimes occurring in California against plaintiff, in addition to the People of the State of California.
- 2. That on August 17, 1972, defendant agents and employees, ATTORNEY GENERAL YOUNGER and ANDREW TICKVITZA, maliciously interfered with plaintiff's business activities and attempted to discredit and downgrade plaintiff in the mind of business associate.
- 3. Ther on April 15/24,1974, May 3, 1974, May 4, 1974, Movember 5, 1976, June 4, 1977, February 25, 1978, defendant agents, employees and servants sabotaged plaintiff's business equipment in order to maim or kill plaintiff.
- 4. That on January 23, 1974, defendant agents, employees, and servants, STATE CONTROLLER HOUSTON I. FLOURNOY and STATE POLICE, trespassed, assaulted, and restrained plaintiff to private business property.
- 5. That on January 23, 1976, defendant agent, employees, and servants, CALIFORNIA HIGHWAY PATROL, attacked and battered plaintiff with pursuit plane.
- 6. That on February 3, 1976, defendant agents, employees, and servants, CALIFORNIA HIGHMAY PATROL, tracked and stalked plaintiff all over the CITY OF SACRAMENTO.
- 7. That on February 8, 1974, defendant agents, employees, and servants, CALIFORNIA STATE POLICE and CHIEF GUY R. CATES, assaulted and restrained plaintiff in the State Capitol.
- 2. That on September 29, 1972, defendant agents, employees, and servants, ATTORNEY GENERAL YOUNGER and STATE POLICE, assault-

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ed and restrained plaintiff in the United States Post Office.

- 9. That on September 21 and 27, 1973, defendant agents, employees, and servants, CALIFORNIA STATE POLICE and CHIEF CATES, stalked and tracked plaintiff away from state property.
- 10. That in July 1976, defendant agents, employees, and servants, GOVERNOR EDMUND G. BROWN, Jr., and MARC POCHE, threatened plaintiff's personal safety if plaintiff did not stop trying to file charges of criminal acts in California.
- 11. That on February 11, 1977, defendant agents, employees, and servants, GOVERNOR BROWN, CALIFORNIA STATE POLICE, OFFICERS OATES, SHERWOOD AND WESTON, retaliated against plaintiff for filing this complaint, and in political motivation, assaulted and restrained plaintiff in administrative hearing.
- 12. That on January 23, 1975, defendant agents, employees, and servants, ATTORNEY GENERAL YOUNGER and D.A.G. "ALEXANDER", refused to permit plaintiff to file charges of criminal activity in California, and in furtherance of theharassment of plaintiff, gave the fictitious name of "ALEXANDER".
- 13. That on January 23, 1976, defendant, its agents, employees and servants, ATTORNEY GENERAL YOUNGER and GOVERNOR EDMUND G. BROWN, and others, refused to investigate CALIFORNIA HIGHWAY PA-TROL attack of plaintiff by use of pursuit plane, and refused to accept plaintiff's filing of criminal charges as related to the malicious and negligent acts.
- That on March 23, 1973, defendant, its agents, employees and servants, ATTORNEY GENERAL YOUNGER AND GOVERNOR RONALD REAGAN, and others, refused to investigate and accept plaintiff's filing of criminal charges for crimes committed in California.
- 15. That on or about February 5, 1974, defendant, its agents, employees and servants, ATTORNEY GENERAL YOUNGER and STATE CON-31 TROLLER HOUSTON I. FLOURNOY, and others, refused to investigate 32 CALIFORNIA HIGHWAY PATROL conspiracy with STATE CONTROLLER FLOUR-

NOY, and accept plaintiff's filing of criminal charges for crimes committed in California.

- 16. On August 27, 1976, defendant, its agents, employees, or servants, ATTORNEY GENERAL YOUNGER, FBI, DIRECTOR KELLEY and SMUD, violently assaulted and threatened plaintiff in furtherance of the conspiracy against plaintiff.
- 17. That on or about February 2, 1975, defendant, its agents, employees or servants, ATTORNEY GENERAL YOUNGER and GOVERNOR E.G. BROWN, refused to investigate and correct crimes and charges filed by plaintiff.
- 18. That on or about May 5, 1975, defendant, its agents, enployees or servants, ATTORNEY GENERAL YOUNGER and GOVERNOR EDMUND G. BROWN, refused to investigate and correct crimes and charges filed by plaintiff.
- 19. That from 1972 forward, def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION, NIXON ADMINISTRATION OFFICIALS, STATE OF CALIFORNIA, CITY AND COUNTY OF LOS ANGELES, CITY AND COUNTY OF SACRAMENTO, and others, connived, conspired and collaborated in political federal funding blackmail to suppress plaintiff's technologies and earn (illegal) campaign contributions or support.
- 20. On August 27, 1976, defendant, its agents, employees or servants, FBI, DIRECTOR KELLEY, STATE OF CALIFORNIA, and SMUD, its agent, employee or servant, violently assaulted and threatened plaintiff in furtherance of the conspiracy to suppress plaintiff and in retaliation for filing this lawsuit.
- 21. That from 1972 forward, defendant, its agents, employees or servants, ATTORNEY GENERAL YOUNGER, GOVERNOR BROWN, and others, have acted in wrongful and malicious conspiracy in corrupt practices concerning campaign activities and covering up said activities by wrongfully suppressing plaintiff's technologies in exchange for election campaign support.

The foregoing wrongful conspiracies and acts done by defen-2 dants, and each of them, meant that defendants, and each of them, were not immune from prosecution (28 USC \$2680(b)) because defendants, and each of them, were operating within scope of employment and did not use due care toward plaintiff as provided in 28 USC \$2680(a) and plaintiff was injured.

Ronald Reagan-2943

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Defendant(s) negligently and intentionally conducted themselves with such a knowing lack of care for the rights of plaintiff and others that defentant(s) were directly and proximately responsible for the campaign conducted against plaintiff of fear, intimidation, alarm, menace, duress, emotional distress, apprehension, invasion of privacy, wiretapping, tresspass, libel, slander, assault, battery, false imprisonment, restraint, illegal search and seizure, and other violations of Civil Rights, and the practice of fraud and deceit upon plaintiff, and all other unlawful acts under color of authority and pretense of law herein complained of.

IX

Defendant(s) breach of duty and conduct in office has been so negligent and intentionally illegal so as to create En atmosphere permitting other law enforcement officials, agents, employees and servants, federal, state, county, and city, to do all illegal acts and things herein complained of, and hereinafter and hereinbefore complained of, against plaintiff without appropriate authorities stopping the illegal acts.

IIX

To Plaintiff's knowledge, information and belief, defendant(s), their agents, employees or servants, conspiratorially refused to investigate crimes brought to the attention of appropriate defendant(s) by plaintiff. Defendant(s) instead chose to maintain this pattern and campaign against plaintiff of assault, battery, trespass, fear, intimidation, duress, alarm, emotional distress, invasion of privacy, trespass, libel, slander, violation of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping and search and seizure, and other acts herein complained of, in gross negligence or willful or wanton disregard to the sworn 32 duties of each of them, under color of authority and pretense of - 190 Ronald Reagan-2944

law. Plaintiff was prevented and deprived from doing business with defendants, and each of them.

XIII

Defendants, and each of them, owed plaintiff and others a duty to not intentionally, willfully and negligently inflict bodily harm or loss of property upon them, and owed plaintiff and others their sworn duty to protect plaintiff and others from bodily harm and property damage, and defendants, and each of them, intentionally and intentionally and negligently conspired to not perform that duty.

XIV

Defendant(s), its agents, employees and servants, and each of them, in doing the conspiracies and acts herein complained of, negligently, wantonly and willfully and maliciously violated their sworn oaths of office to uphold and defend the Constitution of the United States and the Constitution of the State of California to protect citizens (Cal.Const.Art.XX), under color of authority and pretense of law.

XV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IVX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

Ronald Reagan-2945

## SIXTY-THIRD CAUSE OF ACTION

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3 The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seg., particularly \$5 10 1982,1983,1985,1986, interference with Civil Rights; redress for 11 violations of the FIRST, FOURTH, and SIXTH Amendments, and the 12 Due Process and Equal Protection Clauses of the FOURTEENTH Amend-13 ment to the United States Constitution, Title 28, United States 14

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Code, Secs. 1331 et seq.

Further, jurisdiction of the Court is invoked under Title 2S, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1933, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or useage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

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Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

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of the privileges and immunities quaranteed to plaintiff by 2 Amendments I, IV, V, VI, VII, and NIV of the United States Constitution.

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Plaintiff does hereby incorporate and adopt by reference. 6 all allogations set forth in JURISDICTION (page 2); Title 28 of the United States Code, Sections 1343 and 1346(b); Title 42 of the United States Cods, Section 1981 et seq.; Apondments I. IV. V, VI, VII, and XIV of the Constitution of the United States.

III -C

Plaintiff does beroby incorporate and adopt by reference. all allegations set forth in all causes of action herein, hereinaftur and hereinbefore complained of, for deprivations of 14 privileges and immunities under color of authority and pretense 15 of law and magligance.

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Ronald Reagan-2947

IV

Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars, and the UNITED STATES is a party.

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

Each of the acts and conspiracies herein complained of in subparagraph IX are incorporated herein, hereinfafter, and hereinbefore, as causing the injuries and damages to plaintiff by the defendant, its agents, employees or servants.

VII

Each of said acts and conspiracies were done against plaintiff by defendant, its agents, employees or servants, acting under the sole and exclusive management and control of defendant, and in the course of their employment with defendant, its agents, employees and servants.

VIII

Each of said acts and conspiricies and things done were maliciously, willfully, wantonly, intentionally and negligently done against plaintiff by defendant, its agents, employees and servants, under the color of authority and pretense of law, without cause or provocation, in negligent acts or ommissions to acts 30 causing plaintiff's injuries.

Ronald Reagan-2948

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The negligence and patternof acts and conspiracies of defendant COUNTY OF SACRAMENTO, its agents, employees, and servants, have caused plaintiff serious, severe, and permanent injuries:

- That in February 1974, defendant, its agents, employees or servants, SACRAMENTO COUNTY SHERIFF'S DEPARTMENT, refused to investigate or lift the law enforcement conspiracy imposed wrongfully on plaintiff.
- 2. That on or about May 1, 1975, defendant, its agents, employees or servants, SACRAMENTO COUNTY SHERIFF'S DEPARTMENT and SHERIFF DUANE LOWE and INSPECTOR ROBERT BLYTHE, refused to investigate plaintiff's filing of criminal charges with SACRAMENTO SHERIFF'S INSPECTOR BLYTHE; choosing instead to act as though SHERIFF'S INSPECTOR ROBERT BLYTHE never was employed by the SAC-RAMENTO SHERIFFS DEPARTMENT: choosing instead to negligently and wrongfully fail to act as the top law enforcement agency in the COUNTY OF SACRAMENTO, the CITY OF SACRAMENTO POLICE DEPARTMENT having negligently and wantonly failed in its duties of law enforcement in SACRAMENTO.
- 3. That on or about April 29, 1976, defendant, its agents, employees or servants, DISTRICT ATTORNEY JOHN PRICE, and others refused to investigate crimes committed in SACRAMENTO COUNTY by officials of SACRAMENTO COUNTY.
- 4. That on or about August 22, 1975, defendant, its agents, employees or servants, SACRAMENTO SHERIFFS DEPARTMENT and SHERIFF DUANE LOWE, refused to investigate the attack, beating, false 27 arrest, false imprisonment, strangulation and handcuffing of plaintiff in the Post Office.
  - 5. From 1972 forward, defs. LEAA, NIXON ADMINISTRATION, CITY AND COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, CITY AND COUNTY OF SACRAMENTO, and others, connived, conspired, collaborated in political and federal funding blackmail to suppress plaintiff's

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1 technologies and earn (illegal) campaign contributions and 2 support.

The foregoing wrongful conspiracies and acts done by defen-4 dants, and each of them, meant that defendants, and each of them, 5 were not immune from prosecution (28 USC \$2680(h)) because defen-6 dants, and each of them, were operating within scope of employ-7 ment and did not use due care toward plaintiff as provided in 28 USC \$2680(a) and plaintiff was injured.

 Ronald Reagan-2950

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Defendant(s) negligently and intentionally conducted themselves with such a knowing lack of care for the rights of plaintiff and others that defentant(s) were directly and proximately
responsible for the campaign conducted against plaintiff of fear,
intimidation, alarm, menace, duress, emotional distress, apprehension, invasion of privacy, wiretapping, tresspass, libel, slander, assault, battery, false imprisonment, restraint, illegal
search and seizure, and other violations of Civil Rights, and the
practice of fraud and deceit upon plaintiff, and all other unlawful acts under color of authority and pretense of law herein
complained of.

XI

Defendant(s) breach of duty and conduct in office has been so negligent and intentionally illegal so at to create an atmosphere permitting other law enforcement officials, agents, employees and servants, federal, state, county, and city, to do all illegal acts and things herein complained of, and hereinafter and hereinbefore complained of, against plaintiff without appropriate authorities stopping the illegal acts.

XII

To Plaintiff's knowledge, information and belief, defendant(s), their agents, employees or servants, conspiratorially refused to investigate crimes brought to the attention of appropriate defendant(s) by plaintiff. Defendant(s) instead chose to maintain this pattern and campaign against plaintiff of assault, battery, trespass, fear, intimidation, duress, alarm, emotional distress, invasion of privacy, trespass, libel, slander, violation of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping and search and seizure, and other acts herein complained of, in gross negligence or willful or wanton disregard to the sworn duties of each of them, under color of authority and pretense of

Ronald Reagan-2951

- 196 -

law. Plaintiff was prevented and deprived from doing business with defendants, and each of them.

IIIX

Defendants, and each of them, owed plaintiff and others a duty to not intentionally, willfully and negligently inflict bodily harm or loss of property upon them, and owed plaintiff and others their sworn duty to protect plaintiff and others from bodily harm and property damage, and defendants, and each of them, intentionally and intentionally and negligently conspired to not perform that duty.

XIV

Defendant(s), its agents, employees and servants, and each of them, in doing the conspiracies and acts herein complained of, negligently, wantonly and willfully and maliciously violated their sworn oaths of office to uphold and defend the Constitution of the United States and the Constitution of the State of California to protect citizens (Cal.Const.Art.XX), under color of authority and pretense of law.

XV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAYAGES from page 274.

XVI

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

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Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff of the privileges and immunities guaranteed to plaintiff by Amend-

III -A

## SIXTY-FOURTH CAUSE OF ACTION

The Court has jurisdiction in this matter under Title 23, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly \$5: 1982,1983,1985,1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

# Ronald Reagan-2953

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Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or useage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

ments I, IV, V, VI, VII, and XIV, of the United States Constitution.

III -B

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JULISDECTION (page 2); Title 38 of the United States Code, Sections 1243 and 1246(b); Title 42 of the United States Code, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and NIV to the Constitution of the United States.

III -C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, herein-after and hereinheiters complained of, for deprivations of privileges and instmition under color of authority and protones of law.

Ronald Reagan-2954

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IV

Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars, and the UNITED STATES is a party.

V

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN POES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

Each of the acts and conspiracies herein complained of in subparagraph IX are incorporated herein, hereinfafter, and hereinbefore, as causing the injuries and damages to plaintiff by the
defendant, its agents, employees or servants.

VII

Each of said acts and conspiracies were done against plaintiff by defendant, its agents, employees or servants, acting under the sole and exclusive management and control of defendant, and in the course of their employment with defendant, its agents, employees and servants.

VIII

Each of said acts and conspiricies and things done were maliciously, willfully, wantonly, intentionally and negligently done against plaintiff by defendant, its agents, employees and servants, under the color of authority and pretense of law, without cause or provocation, in negligent acts or ommissions to acts causing plaintiff's injuries.

Ronald Reagan-2955

IX

The negligence and pattern of acts and conspiracies of defendant CITY OF SACRAMENTO, its agents, employees, and servants, have caused plaintiff serious, severe, and permanent injuries:

- That throughout the summer of 1973, and expecially January 23, 1974 and May 8, 1974, defendant agents, employees or servants, uniformed police officers in decaled vehicles of the CITY OF SACRAMENTO and SACRAMENTO POLICE DEPARTMENT, wrongfully tracked and followed plaintiff throughout the streets of Sacramento.
- 2. Incorporating sub-paragraph 1. above, SACRAMENTO POLICE DEPARTMENT OFFICERS followed plaintiff for blocks at a time, and on circuitious routes, in 1975 and 1976, especially May 5, 1975, February 10, 1976, and April 25, 1976.
- 3. Incorporating sub-paragraphs 1. and 2. above, defendant agent, employee, or servant BADGE 295 followed plaintiff during summer of 1974 and on July 23, 1975.
- 4. Incorporating sub-paragraphs 1.,2., and 3. above, defendant agent, employee, or servant OFFICER GORSKI (BADGE NO. 341) stalked plaintiff, especially October 3, 1974, all over Mckinley Park, and on May 14, 1975.
- 5. Incorporating sub-paragraphs 1.-4. above, defendant agent, employee or servant, unknown CITY OF SACRAMENTO POLICE OFFICER in decaled vehicle attempted to ram plaintiff's legally parked business vehicle on February 10, 1976.
- 6. That on July 25, 1972, defendant, its agents, employees or servants, SACRAMENTO CITY POLICE DEPARTMENT and CHIEF WILLIAM J. KINNEY, and others, libeled and slandered plaintiff with false information concerning plaintiff's business.
- That on August 22, 1975, defendant, its agents, employees and servants, SACRAMENTO CITY POLICE DEPARTMENT and CHIEF WILLIAM J. KINNEY, and others, refused to investigate the attack, beating,

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false arrest, false imprisonment, strangulation and handcuffing

of plaintiff in the Post Office.

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- That on March 16, 1976, defendant, its agents, employees or servants, SACRAMENTO CITY POLICE DEPARTMENT and CHIEF OF POLICE WILLIAM J. KINNEY, refused to investigate crimes committed in Sacramento and personally filed before KINNEY by plaintiff BRONSON.
- That on September 27, 1973, defendant, its agents, employees or servants, CITY OF SACRAMENTO, POLICE DEPARTMENT and CHIEF KINNEY, uniformed officer assaulted plaintiff with official police vehicle.
- 10. That on October 15, 1974, defendant, its agents, employees or servants, CITY OF SACRAMENTO, POLICE DEPARTMENT and CHIEF KINNEY, uniformed officer assaulted plaintiff with official police vehicle.
- That on May 5, 1975, defendant, its agents, employees or servant, CITY OF SACRAMENTO, OFFICE OF THE MAYOR, refused to investigate and order stopped all conspiracies, assults and other illegal acts by CITY OF SACRAMENTO agents, employees or servants.
- That on April 30, 1976, defendant, its agents, employees or servants, CITY OF SACRAMENTO, OFFICE OF THE MAYOR, refused to investigate and order stopped all continuing conspiracies, assaults and other illegal acts against plaintiff by def. CITY OF SACRAMENTO agents, employees or servants.
- 13. That from 1972 forward, def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION, NIXON ADMINISTRATION OFFICIALS, STATE OF CALI-FORNIA, CITY AND COUNTY OF LOS ANGELES, CITY AND COUNTY OF SACRA-MENTO, and others, connived, conspired and collaborated in political federal funding blackmail to suppress plaintiff's technologies and earn (illegal) campaign contributions.or support. 28

The foregoing wrongful conspiracies and acts done by defen-30 dants, and each of them, meant that defendant(s) were not immune from prosecution (28USCs2680(b)) because defendant(s) were opera-32 ting within scope of employment and did not use due care toward

plaintiff as provided in 28USC\$2680(a) and plaintiff was injured.

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Defendant(s) negligently and intentionally conducted themselves with such a knowing lack of care for the rights of plaintiff and others that defentant(s) were directly and proximately
responsible for the campaign conducted against plaintiff of fear,
intimidation, alarm, menace, duress, emotional distress, apprehension, invasion of privacy, wiretapping, tresspass, libel, slander, assault, battery, false imprisonment, restraint, illegal
search and seizure, and other violations of Civil Rights, and the
practice of fraud and deceit upon plaintiff, and all other unlawful acts under color of authority and pretense of law herein
complained of.

XI

Defendant(s) breach of duty and conduct in office has been so negligent and intentionally illegal so be to create an atmosphere permitting other law enforcement officials, agents, employees and servants, federal, state, county, and city, to do all illegal acts and things herein complained of, and hereinafter and hereinbefore complained of, against plaintiff without appropriate authorities stopping the illegal acts.

XII

To Plaintiff's knowledge, information and belief, defendant(s), their agents, employees or servants, conspiratorially refused to investigate crimes brought to the attention of appropriate defendant(s) by plaintiff. Defendant(s) instead chose to maintain this pattern and campaign against plaintiff of assault, battery, trespass, fear, intimidation, duress, alarm, emotional distress, invasion of privacy, trespass, libel, slander, violation of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping and search and seizure, and other acts herein complained of, in gross negligence or willful or wanton disregard to the sworn duties of each of them, under color of authority and pretense of \_Regald Reagan-2958

law. Plaintiff was prevented and deprived from doing business with defendants, and each of them.

XIII

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Defendants, and each of them, cwed plaintiff and others a duty to not intentionally, willfully and negligently inflict bodily harm or loss of property upon them, and owed plaintiff and others their sworn duty to protect plaintiff and others from bodily harm and property damage, and defendants, and each of them, intentionally and intentionally and negligently conspired to not perform that duty.

XIV

Defendant(s), its agents, employees and servants, and each of them, in doing the conspiracies and acts herein complained of, negligently, wantonly and willfully and maliciously violated their worm oaths of office to uphold and defend the Constitution of the United States and the Constitution of the State of California to protect citizens (Cal.Const.Art.XX), under color of authority and pretense of law.

XV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XVI

wherefore, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

Ronald Reagan-2959

## SIXTY-FIFTH CAUSE OF ACTION

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The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly 55, 1982,1983,1985,1936, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or useage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

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of the privileges and immulties quaranteed to plaintiff by Assuments I, IV, V. VI. VII. and IIV of the United States Constitution.

III --3

Plaintiff does hereby incorporate and adopt by rederence. all allogations set forth in JURISDECTION (page 2); Title 23 of the United States Code, Sections 1343 and 1346(b); Title 42 of the United States Code, Section 1981 of seq.; Associants I. TV. V, VI, VII, and XIV of the Constitution of the United States.

III -C

Plaintiff does becary incorporate and adopt by reference. all allegations set forth in all causes of action horein, hereinafter and hereinbeines complained of, for deprivations of privileges and immunities under color of authority and proteome of law and negligence.

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IV

Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars, and the UNITED STATES is a party.

ORIGINAL

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Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

Each of the acts and conspiracies herein complained of in subparagraph IX are incorporated herein, hereinfafter, and hereinbefore, as causing the injuries and damages to plaintiff by the defendant, its agents, employees or servants.

VII

Each of said acts and conspiracies were done against plaintiff by defendant, its agents, employees or servants, acting under the sole and exclusive management and control of defendant, and in the course of their employment with defendant, its agents, employees and servants.

VIII

Each of said acts and conspiricies and things done were maliciously, willfully, wantonly, intentionally and negligently done against plaintiff by defendant, its agents, employees and servants, under the color of authority and pretense of law, without cause or provocation, in negligent acts or ommissions to acts causing plaintiff's injuries.

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The negligence and pattern of acts and conspiracies of defendants CITY AND COUNTY OF LOS ANGELES, their agents, employees or servants, have caused plaintiff serious, severe, and permanent injuries:

- That from 1972 forward, def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION, NIXON ADMINISTRATION OFFICIALS, STATE OF CALI-FORNIA, CITY AND COUNTY OF LOS ANGELES, CITY AND COUNTY OF SAC-RAMENTO, and others, connived, conspired and collaborated in political federal funding blackmail to suppress plaintiff's technologies and earn (illegal) campaign contributions or support.
- That on or about May 15, 1975, def. CITY OF LOS ANGELES, MAYOR THOMAS BRADLEY, refused to investigate conspiracies and federal funding blackmail in LOS ANGELES POLICE DEPARTMENT.
- That in return for not implementing plaintiff's law enforcement technologies and new lifesaving applications, LOS ANGELES COUNTY, SHERIFFS DEPARTMENT, SHERIFF PETER PITCHESS, was seriously considered by the NIXON ADMINISTRATION for Director of the FBI.
- That on or about February 4, 1975, defendant COUNTY OF LOS ANGELES, DISTRICT ATTORNEY, refused to investigate plaintiff's filing of criminal conspiracy charges and permitted the conspiracies to continue against plaintiff.

The foregoing wrongful conspiracies and acts done by defen-25 dants, and each of them, meant that defendant(s) were not immune  $^{26}$  from prosecution (23USCs2630(b)) because defendant(s) were opera-27 ting within scope of employment and did not use due care toward 28 plaintiff as provided in 28 USC \$2680(a) and plaintiff was injured.

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Defendant(s) negligently and intentionally conducted themselves with such a knowing lack of care for the rights of plaintiff and others that defentant(s) were directly and proximately responsible for the campaign conducted against plaintiff of fear, intimidation, alarm, menace, duress, emotional distress, apprehension, invasion of privacy, wiretapping, tresspass, libel, slander, assault, battery, false imprisonment, restraint, illegal search and seizure, and other violations of Civil Rights, and the practice of fraud and deceit upon plaintiff, and all other unlawful acts under color of authority and pretense of law herein complained of.

IX

Defendant(s) breach of duty and conduct in office has been so negligent and intentionally illegal so as to create an atmosphere permitting other law enforcement officials, agents, employees and servants, federal, state, county, and city, to do all illegal acts and things herein complained of, and hereinafter and hereinbefore complained of, against plaintiff without appropriate authorities stopping the illegal acts.

XII

To Plaintiff's knowledge, information and belief, defendant(s), their agents, employees or servants, conspiratorially refused to investigate crimes brought to the attention of appropriate defendant(s) by plaintiff. Defendant(s) instead chose to maintain this pattern and campaign against plaintiff of assault, battery, trespass, fear, intimidation, duress, alarm, emotional distress, invasion of privacy, trespass, libel, slander, violation of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping 30 and search and seizure, and other acts herein complained of, in 31 gross negligence or willful or wanton disregard to the sworn duties of each of them, under color of authority and pretense of

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law. Plaintiff was prevented and deprived from doing business with defendants, and each of them.

XIII

Defendants, and each of them, owed plaintiff and others a duty to not intentionally, willfully and negligently inflict bodily harm or loss of property upon them, and owed plaintiff and others their sworn duty to protect plaintiff and others from bodily harm and property damage, and defendants, and each of them, intentionally and intentionally and negligently conspired to not perform that duty.

VIX

Defendant(s), its agents, employees and servants, and each of them, in doing the conspiracies and acts herein complained of, negligently, wantonly and willfully and maliciously violated their sworn oaths of office to uphold and defend the Constitution of the United States and the Constitution of the State of California to protect citizens (Cal.Const.Art.XX), under color of authority and pretense of law.

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By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XVI

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper Ronald Reagan-2965

### SIXTY-SIXTH CAUSE OF ACTION

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Code, Secs. 1331 et seg.

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The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq.. for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly \$5: 1982,1983,1985,1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the

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Due Process and Equal Protection Clauses of the FOURTEENTH Amend-

ment to the United States Constitution, Title 23, United States

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being ■ suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or useage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff Ronald Reagan-2966

1 of the privileges and immunities guaranteed to plaintiff by Amendments I, IV, V, VI, VII, and KIV of the United States Constitution.

#### III -B

Plaintiff does hereby :incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 of the United States Code, Sections 1343 and 1346(b); Title 42 of the United States Code, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and XIV of the Constitution of the United States.

#### III -C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinafter and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pretense of law and negligence.

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amount in controversy exceeds Ten Thousand Dollars, and the UNITED STATES is a party.

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V

Plaintiff BRONSON is a citizen of the United States, and the

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

Each of the acts and conspiracies herein complained of in subparagraph IX are incorporated herein, hereinfafter, and hereinbefore, as causing the injuries and damages to plaintiff by the defendant, its agents, employees or servants.

VII

Each of said acts and conspiracies were done against plaintiff by defendant, its agents, employees or servants, acting under the sole and exclusive management and control of defendant, and in the course of their employment with defendant, its agents, employees and servants.

VIII

Each of said acts and conspiricies and things done were maliciously, willfully, wantonly, intentionally and negligently 17 done against plaintiff by defendant, its agents, employees and 28 servants, under the color of authority and pretense of law, with-29 out cause or provocation, in negligent acts or ommissions to acts 30 causing plaintiff's injuries.

Ronald Reagan-2968

- 213 -

The negligence and pattern of acts and conspiracies of defendant SACRAMENTO MUNICIPAL UTILITY DISTRICT (SMUD), its agents, employees or servants, have caused plaintiff serious, severe and permanent injuries:

- 1. That beginning on or about 1972, defendants connived, conspired and collaborated in political federal funding blackmail to suppress plaintiff's technologies and earn (illegal) campaign contributions or support.
- 2. That on August 27, 1976, defendant, its agents, employees or servants, FBI, DIRECTOR CLARENCE KELLEY, and others, in conspiracy, violently assaulted and threatened plaintiff in furtherance of the conspiracy against plaintiff in retaliation for filing this lawsuit.

The foregoing wrongful conspiracies and acts done by defendants, and each of them, meant that defendant(s) were not immune from prosecution (28 USC \$2680(b)) because defendant(s) were operating within scope of employment and did not use due care toward plaintiff as provided in 28 USC \$2680(a) and plaintiff was injured.

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Defendant(s) negligently and intentionally conducted themselves with such a knowing lack of care for the rights of plaintiff and others that defentant(s) were directly and proximately responsible for the campaign conducted against plaintiff of fear, intimidation, alarm, menace, duress, emotional distress, apprehension, invasion of privacy, wiretapping, tresspass, libel, slander, assault, battery, false imprisonment, restraint, illegal search and seizure, and other violations of Civil Rights, and the practice of fraud and deceit upon plaintiff, and all other unlawful acts under color of authority and pretense of law herein complained of.

XI

Defendant(s) breach of duty and conduct in office has been so negligent and intentionally illegal so as to create an atmosphere permitting other law enforcement officials, agents, employees and servants, federal, state, county, and city, to do all illegal acts and things herein complained of, and hereinafter and hereinbefore complained of, against plaintiff without appropriate authorities stopping the illegal acts.

XII

To Plaintiff's knowledge, information and belief, defendant(s), their agents, employees or servants, conspiratorially refused to investigate crimes brought to the attention of appropriate defendant(s) by plaintiff. Defendant(s) instead chose to maintain this pattern and campaign against plaintiff of assault, battery, trespass, fear, intimidation, duress, alarm, emotional distress, invasion of privacy, trespass, libel, slander, violation of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping and search and seizure, and other acts herein complained of, in gross negligence or willful or wanton disregard to the sworn 32 duties of each of them, under color of authority and pretense of Ronald Reagan-2970

law. Plaintiff was prevented and deprived from doing business with defendants, and each of them.

XIII

Defendants, and each of them, owed plaintiff and others a duty to not intentionally, willfully and negligently inflict bodily harm or loss of property upon them, and owed plaintiff and others their sworn duty to protect plaintiff and others from bodily harm and property damage, and defendants, and each of them, intentionally and intentionally and negligently conspired to not perform that duty.

XIV

Defendant(s), its agents, employees and servants, and each of them, in doing the conspiracies and acts herein complained of, negligently, wantonly and willfully and maliciously violated their sworn oaths of office to uphold and defend the Constitution of the United States and the Constitution of the State of California to protect citizens (Cal.Const.Art.XX), under color of authority and pretense of law.

XV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAYAGES from page 274.

XVI

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper Ronald Reagan-2971 by this Court.

SIXTY-SEVENTH CAUSE OF ACTION

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The Court has jurisdiction in this matter under Title 23, United States Code, Secs. 1343, 1346(b), 2671 etseg., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly \$5. 1982,1983,1985,1986, interference with Civil Rights; redress for

Due Process and Equal Protection Clauses of the FOURTEENTH Amend-

ment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

violations of the FIRST, FOURTH, and SIXTH Amendments, and the

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or useage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff -217 Ronald Reagan-2972

of the privileges and immunities quaranteed to plaintiff by Amendments I, TV, V, VI, VII, and HIV of the United States 3 Constitution.

## III -B

Plaintiff does hereby ; incorporate and adopt by reference. all allegations set forth in JUNISDICTICS (page 2); Title 23 of the United States Code, Sections 1343 and 1346(b); Title 42 of the United States Code, Section 1981 ;et seq.; Armendments I, IV. V, VI, VII, and XIV of the Constitution of the United States.

#### III -C

Plaintiff does hereby incorporate and adopt by reference. 12 all allegations set forth in all causes of action herein, hereinafter and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pretense of law and negligence.

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Ronald Reagan-2974

IV

Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars, and the UNITED STATES is a party.

ORIGINAL

V

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

Each of the acts and conspiracies herein complained of in subparagraph IX are incorporated herein, hereinfafter, and hereinbefore, as causing the injuries and damages to plaintiff by the defendant, its agents, employees or servants.

VII

Each of said acts and conspiracies were done against plaintiff by defendant, its agents, employees or servants, acting under the sole and exclusive management and control of defendant, and in the course of their employment with defendant, its agents, employees and servants.

VTTT

Each of said acts and conspiricies and things done were maliciously, willfully, wantonly, intentionally and negligently done against plaintiff by defendant, its agents, employees and servants, under the color of authority and pretense of law, without cause or provocation, in negligent acts or ommissions to acts an causing plaintiff's injuries.

IX

The negligence and pattern of acts and conspiracies of defendants AMERICAN TELEPHONE AND TELEGRAPH and PACIFIC TELEPHONE COMPANY DIVISION, their agents, employees or servants, have caused plaintiff serious, severe and permanent injuries:

- 1. That beginning on or about 1972, defendants, their agents, employees or servants, have conspired, connived, and collaborated with defs. FBI, STATE OF CALIFORNIA, and others, and maintained illegal wiretaps (warrantless searches) on plaintiff's business telephone and hame illegally monitored, recorded, or other, each business telephone conversation of plaintiff's, removing from plaintiff unrestricted lawful use of business telephone.
- 2. That on August 26, 1973, defendants, their agents, employees or servants, assaulted plaintiff, threatened mayhem and permanent bodily damage, and refused to remove illegal wiretap.
- 3. That beginning on or about 1972, defendants, their employees, agents or servants, have conspired, connived, and collaborated with defs. FBI, STATE OF CALIFORNIA, and others, and have deliberately caused plaintiff's business telephone to "ring" incessantly and "malfunction".
- 4. That from 1972 forward, def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION, NIXON ADMINISTRATION OFFICIALS, STATE OF CALIFORNIA, CITY AND COUNTY OF LOS ANGELES, CITY AND COUNTY OF SACRAMENTO, ATT/PIT, and others, connived, conspired and collaborated in political federal funding blackmail to suppress plaintiff's technologies and earn (illegal) campaign contributions or support.

The foregoing wrongful conspiracies and acts done by defendants, and each of them, meant that defendant(s) were not immune from prosecution (28 USC \$2680(b)) because defendant(s) were operating within scope of employment and did not use due care toward plaintiff as provided in 28 USC \$2680(a) and plaintiff was injured.

X

Defendant(s) regligently and intentionally conducted themselves with such a knowing lack of care for the rights of plaintiff and others that defentant(s) were directly and proximately
responsible for the campaign conducted against plaintiff of fear,
intimidation, alarm, menace, duress, emotional distress, apprehension, invasion of privacy, wiretapping, tresspass, libel, slander, assault, battery, false imprisonment, restraint, illegal
search and seizure, and other violations of Civil Rights, and the
practice of fraud and deceit upon plaintiff, and all other unlawful acts under color of authority and pretense of law herein
complained of.

XI

Defendant(s) breach of duty and conduct in office has been so negligent and intentionally illegal so as to create an atmosphere permitting other law enforcement officials, agents, employees and servants, federal, state, county, and city, to do all illegal acts and things herein complained of, and hereinafter and hereinbefore complained of, against plaintiff without appropriate authorities stopping the illegal acts.

Ronald Reagan-2976

To Plaintiff's knowledge, information and belief, defendant(s), their agents, employees or servants, conspiratorially refused to investigate crimes brought to the attention of appropriate defendant(s) by plaintiff. Defendant(s) instead chose to maintain this pattern and campaign against plaintiff of assault, battery, trespass, fear, intimidation, duress, alarm, emotional distress, invasion of privacy, trespass, libel, slander, violation of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping and search and seizure, and other acts herein complained of, in gross negligence or willful or wanton disregard to the sworn duties of each of them, under color of authority and pretense of

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law. Plaintiff was prevented and deprived from doing business with defendants, and each of them.

XTTT

Defendants, and each of them, owed plaintiff and others a duty to not intentionally, willfully and negligently inflict bodily harm or loss of property upon them, and owed plaintiff and others their sworn duty to protect plaintiff and others from bodily harm and property damage, and defendants, and each of them, intentionally and intentionally and negligently conspired to not perform that duty.

XIV

Defendant(s), its agents, employees and servants, and each of them, in doing the conspiracies and acts herein complained of, negligently, wantonly and willfully and maliciously violated their sworn oaths of office to uphold and defend the Constitution of the United States and the Constitution of the State of California to protect citizens (Cal.Const.Art.XX), under color of authority and pretense of law.

VX

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XVI

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

#### SIXTY-EIGHTH CAUSE OF ACTION

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I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly 55: 1982,1983,1985,1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or useage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff Ronald Reagan-2978 **-** 223 ·

of the privileges and immunities guaranteed to plaintiff by Amendments I, IV, V, VI, VII, and XIV of the United States Constitution.

#### III -B

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 of the United States Code, Sections 1343 and 1346(b); Title 42 of the United States Code, Section 1981 et seq.; Amendments I, IV, VI, VII, and XIV of the Constitution of the United States.

## III -C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinafter and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pretense of law and negligence.

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Ronald Reagan-2980

IV

Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars, and the UNITED STATES is a party.

ORIGINAL

V

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

Each of the acts and conspiracies herein complained of in subparagraph IX are incorporated herein, hereinfafter, and hereinbefore, accusing the injuries and damages to plaintiff by the defendant, its agents, employees or servants.

VII

Each of said acts and conspiracies were done against plaintiff by defendant, its agents, employees or servants, acting under the sole and exclusive management and control of defendant, and in the course of their employment with defendant, its agents, employees and servants.

VIII

Each of said acts and conspiricies and things done were maliciously, willfully, wantonly, intentionally and negligently done against plaintiff by defendant, its agents, employees and servants, under the color of authority and pretense of law, without cause or provocation, in negligent acts or ommissions to acts causing plaintiff's injuries.

The negligence and pattern of acts and conspiracies of defendant WESTERN UNION TELEGRAPH COMPANY, its agents, employees or servants, have caused plaintiff serious, severe and permanent injuries:

- 1. That on or about April 28, 1973, plaintiff paid for telegraphic message to NIXON ADMINISTRATION OFFICIALS, and defendant connived, conspired, and collaborated with defs. FBI, SECRET SERVICE, and others, to suppress, destroy and otherwise not deliver plaintiff's telegraphic message.
- 2. That beginning on or about April 1973, defendants LAW ENFORCEMENT ASSISTANCE ADMINISTRATION, NIXON ADMINISTRATION OFFI-CIALS, STATE OF CALIFORNIA, CITY AND COUNTY OF LOS ANGELES, CITY AND COUNTY OF SACRAMENTO, ATT/PTT, WESTERN UNION, and others, connived, conspired and collaborated in political federal funding blackmail to suppress plaintiff's technologies and earn (illegal) campaign contributions or support.

The foregoing wrongful conspiracies and acts done by defendants, and each of them, meant that defendant(s) were not immune from prosecution (28 USC \$2680(h)) because defendant(s) were operating within scope of employement and did not use due care toward plaintiff as provided in 28 USC \$2680(a) and plaintiff was injured.

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Defendant(s) negligently and intentionally conducted themselves with such a knowing lack of care for the rights of plaintiff and others that defentant(s) were directly and proximately responsible for the campaign conducted against plaintiff of fear, intimidation, alarm, menace, duress, emotional distress, apprehension, invasion of privacy, wiretapping, tresspass, libel, slander, assault, battery, false imprisonment, restraint, illegal search and seizure, and other violations of Civil Rights, and the practice of fraud and deceit upon plaintiff, and all other unlawful acts under color of authority and pretense of law herein complained of.

IX

Defendant(s) breach of duty and conduct in office has been so negligent and intentionally illegal sc as to create an atmosphere permitting other law enforcement officials, agents, employees and servants, federal, state, county, and city, to do all illegal acts and things herein complained of, and hereinafter and hereinbefore complained of, against plaintiff without appropriate authorities stopping the illegal acts.

IIX

To Plaintiff's knowledge, information and belief, defendant(s), their agents, employees or servants, conspiratorially refused to investigate crimes brought to the attention of appropriate defendant(s) by plaintiff. Defendant(s) instead chose to maintain this pattern and campaign against plaintiff of assault, battery, trespass, fear, intimidation, duress, alarm, emotional distress, invasion of privacy, trespass, libel, slander, violation of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping and search and seizure, and other acts herein complained of, in gross negligence or willful or wanton disregard to the sworn 32 duties of each of them, under color of authority and pretense of Ronald Reagan-2982

227 -

law. Plaintiff was prevented and deprived from doing business with defendants, and each of them.

XIII

Defendants, and each of them, owed plaintiff and others a duty to not intentionally, willfully and negligently inflict bodily harm or loss of property upon them, and owed plaintiff and others their sworn duty to protect plaintiff and others from bodily harm and property damage, and defendants, and each of them, intentionally and intentionally and negligently conspired to not perform that duty.

XIV

Defendant(s), its agents, employees and servants, and each of them, in doing the conspiracies and acts herein complained of, negligently, wantonly and willfully and maliciously violated their sworn oaths of office to uphold and defend the Constitution of the United States and the Constitution of the State of California to protect citizens (Cal.Const.Art.XX), under color of authority and pretense of law.

XV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XVI

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

Ronald Reagan-2983

#### SIXTY-NINTH CAUSE OF ACTION

Code, Secs. 1331 et seq.

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinment of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly \$5: 1982,1983,1985,1986, interference with Civil Rights; redress for

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violations of the FIRST, FOURTH, and SIXTH Amendments, and the

Due Process and Equal Protection Clauses of the FOURTEENTH Amend-

ment to the United States Constitution, Title 28, United States

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or useage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

- 228001ald Reagan-2984

of the privileges and immunities guaranteed to plaintiff by Amendments I, IV, V, VI, VII, and XIV of the United States Constitution.

#### III -B

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 of the United States Code, Sections 1343 and 1346(b); Title 42 of the United States Code, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and XIV of the Constitution of the United States.

#### III -C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinafter and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pretense of law and negligence.

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ORIGINAL

IV

Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars, and the UNITED STATES is a party.

V

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

Each of the acts and conspiracies herein complained of in subparagraph IX are incorporated herein, hereinfafter, and hereinbefore, as causing the injuries and damages to plaintiff by the defendant, its agents, employees or servants.

VII

Each of said acts and conspiracies were done against plaintiff by defendant, its agents, employees or servants, acting under the sole and exclusive management and control of defendant, and in the course of their employment with defendant, its agents, employees and servants.

VIII

Each of said acts and conspiricies and things done were maliciously, willfully, wantonly, intentionally and negligently done against plaintiff by defendant, its agents, employees and servants, under the color of authority and pretense of law, without cause or provocation, in negligent acts or ommissions to acts causing plaintiff's injuries.

The negligence and pattern of acts and conspiracies of defendants WINCHESTER WESTERN/OLIN, REMINGTON ARMS/DUPONT, COLT, their agents, employees or servants, have caused plaintiff serious, severe and permanent injuries:

- l. That beginning on or about 1971, defendents, their servants, agents and employees, have collaborated, connived, and conspired with the UNITED STATES ARMY to eliminate competition from plaintiff and his firearms and related technologies.
- 2. That beginning on or about 1971, defendants, their servants, agents and employees, have collaborated, connived and conspired with NIXON ADMINISTRATION OFFICIALS for the defendants' payments of illegal campaign contributions to NIXON OFFICIALS in exchange for which NIXON OFFICIALS, FRI, LEAA, and others, did not permit any federal lawenforcement or military agency to conduct business with plaintiff.
- 3. That beginning on or about 1971, defendants, their servants, agents and employees, have collaborated, connived and conspired with local retail dealers (gunshops, hardware stores, etc.) and suppressed and stopped any person licensing or implementing plaintiff's technologies for fear of losing defendants' firearms "lines", and thus being forced to go out of business.
- 4. That beginning on or about 1972, defendants, their servants, agents and employees, have collaborated, connived and conspired with local governments (law enforcement), to suppress plaintiff's technologies from implementation locally.

The foregoing wrongful conspiracies and acts done by defendants, and each of them, meant that defendant(s) were not immune from prosecution (28 USC \$2680(h)) because defendant(s) were operating within scope of employement and did not use due care toward plaintiff as provided in 28 USC \$2680(a) and plaintiff was injured.

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Defendant(s) negligently and intentionally conducted themselves with such a knowing lack of care for the rights of plaintiff and others that defentant(s) were directly and proximately
responsible for the campaign conducted against plaintiff of fear,
intimidation, alarm, menace, duress, emotional distress, apprehension, invasion of privacy, wiretapping, tresspass, libel, slander, assault, battery, false imprisonment, restraint, illegal
search and seizure, and other violations of Civil Rights, and the
practice of fraud and deceit upon plaintiff, and all other unlawful acts under color of authority and pretense of law herein
complained of.

IX

Defendant(s) breach of duty and conduct in office has been so negligent and intentionally illegal as as to create an atmosphere permitting other law enforcement officials, agents, employees and servants, federal, state, county, and city, to do all illegal acts and things herein complained of, and hereinafter and hereinbefore complained of, against plaintiff without appropriate authorities stopping the illegal acts.

XII

To Plaintiff's knowledge, information and belief, defendant(s), their agents, employees or servants, conspiratorially refused to investigate crimes brought to the attention of appropriate defendant(s) by plaintiff. Defendant(s) instead chose to maintain this pattern and campaign against plaintiff of assault, battery, trespass, fear, intimidation, duress, alarm, emotional distress, invasion of privacy, trespass, libel, slander, violation of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping and search and seizure, and other acts herein complained of, in gross negligence or willful or wanton disregard to the sworn duties of each of them, under color of authority and pretense of

- 23 Ronald Reagan-2988

law. Plaintiff was prevented and deprived from doing business with defendants, and each of them.

IIIX

Defendants, and each of them, owed plaintiff and others a duty to not intentionally, willfully and negligently inflict bodily harm or loss of property upon them, and owed plaintiff and others their sworn duty to protect plaintiff and others from bodily harm and property damage, and defendants, and each of them, intentionally and intentionally and negligently conspired to not perform that duty.

XIV

Defendant(s), its agents, employees and servants, and each of them, in doing the conspiracies and acts herein complained of, negligently, wantonly and willfully and maliciously violated their sworm oaths of office to uphold and defend the Constitution of the United States and the Constitution of the State of California to protect citizens (Cal.Const.Art.XX), under color of authority and pretense of law.

χV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IVX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

Ronald Reagan-2989

# SEVENTIETH CAUSE OF ACTION

I

The action arises under the Fourth Amendment to the Constitution of the United States, as hereinafter more fully appears.

The amount in controversy exceeds, exclusive of interest and costs, the sum of Ten Thousand Dollars.

II

At all times herein mentioned, plaintiff was, and is, a citizen of the United States, and the UNITED STATES is a party.

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plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore EURS these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

IV

plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinafter and hereinbefore complained of, for loss of privileges and immunities under color of authority and pretense of law.

V

# Defendants are:

- 1. Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTORS GRAY, RUCKELSHAUS, AND KELLEY.
- 2. Def. AMERICAN TELEPHONE AND TELEGRAPH COMPANY, PACIFIC TELEPHONE COMPANY DIVISION. Ronald Reagan-2990

VI

Beginning on or about 1971, defendants, and each of them, their agents, employees or servants, in doing the things hereinafter mentioned, acted under the color of authority and pretense of law and deprived plaintiff of the protections, privileges and immunities of Amendments I, IV, V, VI, VII and XIV, U.S. Constitution, and Amendment XIV's Due Process and Equal Protection Clauses.

VII

Beginning on or about 1971, defendant(s), and others, have maliciously, willfully, intentionally, negligently and without warrant maintained plaintiff under constant business telephone wiretap or other illegal electrnic monitoring device. Defendant(s), and each of them, and with others, have maliciously forced the business telephone to "ring" at odd nonbusiness hours, ring incessantly or brokenly, mechanically contrive or otherwise the sounds or voices of callers, and other wrongful acts herein, hereinafter and hereinbefore complained of. Defendant(s), and each of them, have maliciously and deliberately made the business telephone inoperative, disconnected, cutting into business telephone conversations, and subjecting plaintiff's business telephone conversations to the "special attentions" of def. PTT's "Unit 2" operators.

# VIII

Plaintiff in no way consented to the wiretapping, electronic eavesdropping and interference, or warrantless search, nor did plaintiff authorize any of these wrongful acts against his privacy and business telephone conversations, all of these wrongful acts being done willfully, maliciously, intentionally, and negligently against plaintiff.

# Ronald Reagan-2991

IX

The above-mentioned acts and conduct of the defendants, and each of them, claimed by them to be under federal authority, constituted an abuse of their federal authority and regulated Public Utility authority and was not within their scope of employment sefecteral agents, employees or servants, in that their acts and conduct were not based on the exercise or performance of a discretion ary function or duty assumed by them as agents of the FEDERAL BUREAU OF INVESTIGATION or telephonic public utility and were not acts and conduct done pursuant to the regulations of the

- 236 -

FEDERAL BUREAU OF INVESTIGATION or public telephonic utility, and were acts performed within the scope of defendants employment but without exercising due care while acting within the scope of their employment, and defendants, and each of them, acted in fraud, corruption or malice.

X

As a result of the above-mentioned and aforementioned acts and conduct of the defendants, and each of them, plaintiff was deprived of his right to be secure in his person, papers, and effects against unreasonable and warrantless searches and seizures by federal agents, employees, or servants, acting under color or claim of federal authority, as guaranteed to him by the Fourth Amendment to the Constitution of the United States.

XI

As a result of such deprivation, plaintiff suffered great humiliation, embarrassment, mental anguish, and pain to his head and body, and loss of earning capacity, the nature and extent of plaintiff's injuries and damages which shallbe proved at trial, and as incorporated herein under DAMAGES from page 274.

XII

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

# SEVENTY-FIRST CAUSE-OF ACTION

Plaintiff does hereby incorporate and adopt by reference, all 28 allegations set forth in all causes of action herein, hereinafter and hereinbefore complained of, for loss of privileges and immuni-30 ties under color of authority and pretense of law.

Ronald Reagan-2992

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The action arises under the Fourth Amendment to the Constitution of the United States, as hereinafter more fully appears. The matter in controversy exceeds, exclusive of interest and costs, the sum of Ten Thousand Dollars.

II

At all times herein mentioned, plaintiff was, and now is, a citizen of the United States.

III

On or about August 22, 1975, defendants, and each of them, were federal agents employed by the FEDERAL PROTECTIVE SERVICE (FPS/GSA) and LUV SECURITY SERVICE (HW), and in doing the things hereinafter mentioned, acted under the color of their federal authority as such.

IV

On or about August 22, 1975, when plaintiff was going to his post office box in the United States Post Office, plaintiff was assaulted by one "VICTOR MARTINEZ", said "MARTINEZ" having walked, followed, gestured to, and watched plaintiff around Sacramento County and now the Post Office. Plaintiff became so alarmed for his personal safety at the hands of "MARTINEZ" that plaintiff complained to the federal FPS and LUV officers and warned them that plaintiff would place "MARTINEZ" under citizens arrest the next time "MARTINEZ" appeared and assaulted plaintiff in the Post Office. Defendant FPS and LUV OFFICERS requested that plaintiff return to the Post Office with documentation concerning "MARTINEZ".

Ronald Reagan-2993

On August 22, 1975, in less than one hour plaintiff returned to the Post Office with documentation concerning "MARTINEZ" as requested by defendant FPS OFFICERS CHASTAINE AND CLEMONS, AND LUV OFFICERS SMITH AND GREER, when the defendants CHASTAINE, CLEMONS

1 and GREER wrongfully and unlawfully violated plaintiff's constitu-2 tionally protected right to be free from unreasonable search and seizure in that defendants, and each of them, attacked, beat, restrained, handcuffed, strangled, falsely arrested, falsely imprisoned, and otherwise abused plaintiff, without cause or provocation, without search warrant, unlawfully search plaintiff, where plaintiff was subjected to other indignities and held incommunicado for almost one hour. PLAINTIFF WAS NOT ARRESTED.

VI

On August 22, 1975 defendants FPS OFFICER JAMES CHASTAINE and LUV OFFICER GREER further deprived plaintiff of his freedom 12 and forcibly took plaintiff from the United States Post Office 13 and forcibly took plaintiff to his business automobile parked in a private parking lot one block away. Plaintiff was menaced by said defendants, and each of them, for some time at plaintiff's business auto. Plaintiff not only feared for his continued per-17 sonal safety from deadly weapons or fists, but feared for the personal safety of innocent by-standers as well. Defendants had no cause or provocation to so act.

VII

Plaintiff in no way consented to the unreasonable search, seizure, beating, handcuffing, strangulation, false imprisonment, voluntarily and other restraint, nor did plaintiff submit himself/to the control and custody of the defendants, nor did plaintiff authorize any of these wrongful acts against his person, all of these wrongful acts being done willfully, maliciously, intentionally, and 27 | negligently against plaintiff by force of three (3) federal officers beating plaintiff. Ronald Reagan-2994

VIII

- 239 -

The above-mentioned acts and conduct of the defendants, and each of them, claimed by them to be under federal authority, constituted an abuse of their federal authority and was not within

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their scope of employment as federal agents in that their acts and conduct were not based on the exercise or performance of a discretionary function or duty assumed by them as agents of the FEDERAL PROTECTIVE SERVICE and were not acts and conduct done pursuant to the regulations of the FEDERAL PROTECTIVE SERVICE, and were acts performed within the scope of defendants employment BUT WITHOUT EXERCISING DUE CARE WHILE ACTING WITHIN THE SCOPE OF THEIR EMPLOYMENT, and defendants, and each of them, acted in fraud, corruption or malice.

TX

As a result of the above-mentioned and aforementioned acts and conduct of the defendants, and each of them, plaintiff was deprived of his right to be secure in his person, papers, and effects against unreasonable searches and seizures by federal agents acting under color or claim of federal authority, as guaranteed to him by the Fourth Amendment to the Constitution of the United States.

X

As a result of such deprivation, plaintiff suffered great humiliation, embarrassment, mental anguish, and pain to his head requiring medical care and treatment, and body,/the nature and extent of plaintiff's injuries and damages which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XI

wherefore, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

Ronald Reagan-2995

# SEVENTY-SECOND CAUSE OF ACTION

I

) || ||

Plaintiff brings this civil action seeking treble damages and injunctive relief for injuries and threatened and continuing injuries to his business, property and trade caused by defendants monopolistic practices, unreasonable comspiracies and restraints of trade and other violations of the Sherman and Clayton Acts for jurisdiction of this Court under 15 USC \$\$15,26,1,2,13,18; and 28 USC \$1337.

II

plaintiff does hereby incorporate and adopt by reference, all allegations set forth herein, hereinafter and hereinbefore complained of for interference with interstate commerce and competition.

III

Plaintiff GEORGE A BRONSON is President of Anchor International, Inc., a California corporation, having its principal place of business in Sacramento, California. Plaintiff is a Yale graduate Inventor and Patent Holder of Record in the United States, NATO and other allied countries. Plaintiff is the Inventor and Patent Holder of United States Patent No. 3,543,428, author and owner of proprietary, new, efficient lifesaving technologies selectively published in "ANCHOR INTERNATIONAL WEAPONS TRAINING FIRING MANUAL AND BRONSON STRINGFIRE METHOD".

IV

Defendants are found and transact business in States of Mary-land, Virginia, Delaware, New York, California, Washington, D.C., Connecticut, and elsewhere. Ronald Reagan-2996

V

plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

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## Defendants are:

- 1. Def. UNITED STATES ARMY, headquarters The Pentagon, Washington, D.C., for the Aberdeen Proving Grounds, Aberdeen, Maryland, and elsewhere.
- 2. Def. WINCHESTER-WESTERN DIVISION of the OLIN CORPORATION, Stamford, Connecticut.
- 3. Def. REMINGTON ARMS DIVISION of the DUPONT DE NEMOURS CORPORATION, Wilmington, Delaware.
- 4. Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTORS L.P. GRAY
  WILLIAM RUCKELSHAUS, CLARENCE M. KELLEY, headquarters Washington,
  D.C.
  - 5. Def. NATIONAL RIFLE ASSOCIATION of AMERICA, 1600 Rhode Island Avenue, N.W., Washington, D.C.
  - 6. Def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION of the UNITED STATES DEPARTMENT OF JUSTICE, headquarters Washington, D.C.
  - 7. Def. INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE, INC., headquarters ll Firstfield Road, Gaithersburg, Maryland.
  - 8. Def. NATIONAL SHERIFFS ASSOCIATION, 1250 Connecticut Avenue, N.W., Washington, D.C., headquarters.
  - 9. Defs. NIXON ADMINISTRATION WHITE HOUSE OFFICIALS, 1600 Pennsylvania Avenue, Washington, D.C.
    - 10. Def. COLT INDUSTRIES, INC., headquarters New York City.
  - 11. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J.
    YOUNGER and GOVERNOR RONALD REAGAN, State Capitol, Sacramento, CA.
  - 12. Def. LOS ANGELES CITY AND COUNTY, SHERIFF PETER PITCHESS, LOS ANGELES POLICE CHIEF EDWARD DAVIS, Los Angeles, California.
- 13. Def. SACRAMENTO COUNTY, SHERIFF DUANE LOWE, DISTRICT AT\_
  29 TORNEY JOHN PRICE, 720 9th Street, Sacramento, California.
- 14. Def. CITY OF SACRAMENTO, SACRAMENTO POLICE, CHIEF WILLIAM
  Ronald Reagan-2997

  J. KINNEY,

ORIGINAL

15	. Def.	FEDERA	L PROTECTIVE	SERVICE,	OFFICERS	CHASTAINE
CLEMONS	and SN	ELSON,	Sacramento,	Californi	a .	
16	Def	C m z m c	רזגמסקד דססקזז	.a	D177 77707	WALL DAMBOL

- 16. Def. STATE OF CALIFORNIA, CALIFORNIA HIGHWAY PATROL, COMMISSIONER GLENDON B. CRAIG, headquarters Sacramento, California.
- 17. Def. STATE OF CALIFORNIA, STATE POLICE, OFFICERS WESTON and SHERWOOD, CHIEF GUY R. OATES, headquarters Sacramento, CA.
- 18. Def. STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, Jr., MARC POCHE, State Capitol, Sacramento, California.

Ronald Reagan-2998

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Defendants known to plaintiff in his belief include officers, agents and employees, active and retired: UNITED STATES ARIM, The Pentagon, Washington, D.C. 20310 (headquarters), and elsewhere; WINCHESTER WESTERN INTERNATIONAL DIVISION of the OLIN CORPORATION, 120 Long Ridge Road, Stamford, Connecticut 06904; REMINGTON ARMS COMPANY, INC., DIVISION of E.I. DUPONT DE NEMOURS, INC., 1007 Market Street, Wilmington, Delaware 19393; COLT IMDUSTRIES, INC., 430 Park Av., New York 10022, firearms manufacturers in interstate commerce.

VII

In 1971 Defendant UNITED STATES ARMY did perform an incorrect and fraudulent technical analysis of Plaintiff BROMSON's firearms technology, and particularly plaintiff's United States Patent No. 3,543,428, "RIFLE FORESTOCK", and associated STRINGFIRE technology, at Aberdeen Proving Ground, Aberdeen, Maryland. fendants herein named, with full knowledge of the facts as to the law, custom, policies and practices permitting retesting upon petition, did knowingly and unlawfully combine, conspire, agree and have a tacit understanding together with each other and other defendants, to refuse to retest and correct its original wrongful analysis of plaintiff BRONSON's technologies, despite plaintiff's petitions and providing of additional technologies, to restrain a and related technologies part of the trade and commerce in firearms/among the several States of the United States and did, in fact, restrain said trade and commerce in violation of Section 1 of the Sherman Anti-Trust Act.

## Ronald Reagan-2999

VIII

It was a part of said combination and conspiracy, and the object and purpose thereof to accomplish the following, among other things, to-wit:

(1) To arbitrarily, unlawfully, unreasonably and knowingly raise, fix, control, set, stabilize and effect the price and manufacture firearms and related technologies shipped in interstate commerce, as aforesaid, in to the State of California and any of the Sister States of the United States of America.

- (2) To arbitrarily, unlawfully, unreasonably and knowingly prevent, suppress and eliminate competition between defendants and among the defendant manufacturers of firearms and related technologies sales from shipment in interstate commerce, as aforesaid, in to the State of California and any of the Sister States of the United States of America.
- (3) To arbitrarily, unlawfully, unreasonably and knowingly prevent, suppress and eliminate competition from competitors and prospective competitors of the defendant manufacturers of firearms and related technologies and Defendants WINCHESTER, REMINGTON, AND COLT in the manufacture and sale of firearms and related technologies shipped in interstate commerce, as aforesaid, into the State of California and any other State of the United States.
- (4) To arbitrarily, unlawfully, unreasonably and knowingly prevent, suppress and eliminate competition from any source in the sale and manufacture of firearms and related technologies shipped in interstate commerce, as aforesaid, into the State of California and any other State of the United States.
- (5) To establish and maintain unreasonably high, excessive, monopolistic and non-competitive prices and controls for firearms and related technologies shipped in interstate commerce, as aforesaid, into the State of California and any other State of the United States.

  Ronald Reagan-3000

ΙX

As a part of said unlawful combination and conspiracy, in pursuance thereof and in furtherance thereof and to effectuate its object and purpose, the said defendants within the U.S. ARMY did:

(1) In 1971, and continuing to present time, entered into

- 245 -

## Ronald Reagan-3001

1 an agreement and understanding with defendant firearms manufacturers, acting on behalf of all defendants, and each of them, whereby all sales in the State of California and any other State of the United States of firearms and related technologies would not include Plaintiff BRONSON's firearms technologies and Patent. Said agreement and understanding continue in force and effect at all times from the period as stated.

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- (2) In 1971, and continuing to present time, entered into agreement and understanding with defendant firearms manufacturers, acting on behalf of all defendants, and each of them, whereby Defendant U.S. ARMY did knowingly, intentionally, and wrongfully release its incorrect technical analysis of Plaintiff ERONSON's technologies which Defendant ARMY refused to correct, so that only the firearms and related technologies manufactured by the defendant manufacturers, would be acceptable and in accordance with Army specifications and standards, remove from the industry newly invented technology of superior weaponry, thereby eliminating competition from competitive and prospective competitors of defendant firearms manufacturers, and each of them. Said agreement and understanding continue in force and effect to present time.
- In or about 1971, Defendant U.S. ARMY changed, and caused to be changed the specifications and standards regarding manufacture and sale to the United States Government of firearms in concert, collusion and conspiracy with defendant firearms manufacturers, and each of them, at the same time and thereafter failing or refusing to furnish said notice fully to competitors and prospective competitors of said defendant manufacturers of firearms and related technologies.
- (4) At all times after the date of the change in said specifications and standards referred to in sub-paragraph (3) above, Defendant ARMY, acting in the capacity of purchasing agent for the United States Department of Defense and others, notified the defendant firearms manufacturers, and each of them, at the same

## Ronald Reagan-3002

time and thereafter failing and refusing to fully notify competitors and prospective competitors of said defendant firearms manufacturers, and each of them.

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- (5) At all times after said change in the specifications, Defendant ARMY, acting in the capacity of purchasing agent for the U.S. Department of Defense and others, and in concert, collusion and conspiracy with defendant firearms manufacturers, and each of them, surrupticiously rewarded defendant firearms manufacturers, and each of them, with new and extra considerations in the purchase of firearms without bids as rigged/fixed "follow-ohs to existing contracts, without requesting the submitting of bids by competitors and prospective competitors to defendant firearms manufacturers, and each of them.
- In further pursuance of the aforesaid arrangements and agreements, set forth in sub-paragraphs (1) through (5), inclusive, Defendant UNITED STATES ARMY provided extraordinary, behindthe-scenes assistance to firearms manufacturer def. COLT INDUSTRIES during subsequent Federal Bureau of Investigation attempt to uncover the coverup of inferior firing characteristics of the M-16 rifle.
- (7) As a result of said agreements and understandings, Defendant ARMY, acting in concert and collusion with defendant firearms manufacturers, and each of them, in furtherance of said combination and conspiracy, knowingly and deliberately divided large orders for firearms and related technologies under the jurisdiction of the U.S. Department of Defense, into numerous small orders, for the purpose of awarding said small orders to the defendant firearms manufacturers, and each of them, without receiving competitive bids therefor, at a price fixed and agreed upon by said defendants.
- During the period from 1971 to present, inclusive, as = result of the operation of said combination and conspiracy, 32

through the arrangements, agreements and acts set forth in subparagraphs (1) through (7) preceding, defendant firearms manufacturers, and each of them, received commission or other compensation on each firearm and other technology sold to and purchased
by the UNITED STATES, at prices raised, enhanced, fixed, maintained and controlled as aforesaid.

(9) During the period from 1972 to present, inclusive, as ■ result of the operation of said combination and conspiracy, through the arrangements, agreements and acts set forth in subparagraphs (1) through (7) preceding, defendant firearms manufacturers, and each of them, used the "new" price, contract, and business relationship with def. ARMY and NIXON ADMINISTRATION to conspire against, collaborate with, or coerce persons and local retail gun dealers to purchase the defendant(s) firearms "lines" at prices raised, enhanced, fixed, maintained and controlled as aforesaid, threatening to withhold said "lines" should any person and local retail gun dealer license, manufacture, sell, or implement in any way plaintiff's firearms and related technologies, and force local businessmen to lose earnings and profits.

(10) Incorporating the acts and agreements set forth in subparagraph (9) above, defendant firearms manufacturers conspired
against, collabarated with, or coerced local governments in similar manner.

Ronald Reagan-3003

X

While said conspiracy, arrangement and understanding between the defendants, and each of them, was in existence, the UNITED STATES purchased from defendant firearms manufacturers, and each of them, doing business as WINCHESTER WESTERN, REMINGTON ARMS, COLT INDUSTRIES, and firearms manufacturers each of them, a total of billions of dollars for firearms and related technologies, which price was unreasonable and excessive due to the unlawful and illegal conspiracy, agreements and arrangements between the

defendants named herein to raise, fix, maintain, enhance and control said prices. The reasonable price at which said amount of firearms and related technologies could have been purchased under natural and free competitive conditions was millions of dollars less which shall be demonstrated at trial. As a result of said conspiracy so existing at the time these purchases were made from said defendants, and each of them, Plaintiff BRONSON and the State of California and any other State of the United States have suffered damage and injury in their property in actual amounts to be demonstrated at trial, and are entitled under Section 4 of said Sherman Anti-Trust Act, Title 15, United States Code Annotated, Section 15, to threefold damages to be demonstrated at trial, and as incorporated herein under DAMAGES from page 274.

XI

WHEREFORE, Plaintiff demands judgment against the defendants, and each of them, the sum and costs of which shall be demonstrated at trial and treble damages, together with reasonable counsel fee and costs, and for such other relief as is deemed just and proper by this Court; that a temporary restraining order and preliminary injunction may be issued out of this Court upon its order directing the defendant(s) and their agents, servants and employees, from in any manner interfering with the plaintiff in firearms and related technologies, and that after a trial of this cause that said injunction may be made perpetual; that a decree issue from the Court that the conspiracies and acts tended to create a wrongful monopoly in the firearms and related technologies industries, and are to stop and void, and that all conspiracies and/or contracts wrongfully entered into between defendants, and each of them, are null and void; and a reasonable attorney's fee beside the costs and disbursements of this action.

Ronald Reagan-3004

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#### SEVENTY-THIRD CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2).

II

This Court has jurisdiction under 15 USC \$2, Sherman Act, and 28 USC \$1337.

III

Plaintiff does hereby incorporate and adopt by reference, all of the wrongful acts herein complained of, hereinafter and hereinbefore, specifically and especially 72nd - 75th causes cfaction.

TV

Plaintiff is a citizen of the United States.

V

Defendant(s), its officer, agents, employees, or servants,

UNITED STATES ARMY, WINCHESTER WESTERN/OLIN, REMINGTON/DUPONT,

COLT, NATIONAL RIFLE ASSOCIATION, FEDERAL BUREAU OF INTESTIGATION,

WHITE HOUSE OFFICIALS, FEDERAL, STATE, COUNTY AND CITY OFFICIALS,

NATIONAL RIFLE ASSOCIATION (NRA), and others, through collaborating, cooperating and conspiring have entered into plans and

schemes, the purposes of which are to completely control the

firearms and related technologies industries and suppress the

firearms technologies of plaintiff and restrict or prevent plaintiff from doing business in the firearms and related technologies

industries.

Ronald Reagan-3005

VI

Beginning in or about 1971 the U.S.ARMY published to defendants, and each of them, false analysis of plaintiff's technologies. Beginning in or about 1971 and continuing day to day thereafter to the present, the defendants herein named, together with diverse other persons, well knowing all of the foregoing facts,

knowingly and unlawfully did monopolize, attempt to monopolize, and did combine and conspire with each other and other persons to monopolize a part of the trade and commerce in firearms among the several States of the United States, in violation of Section 2 of the Sherman Anti-Trust Act.

VII

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It was a part of said unlawful monopoly, attempt to monopolize, and combination and conspiracy to monopolize, and the object and purpose thereof, to effect and accomplian the following, among other things, to-wit:

- (1) To create and maintain a monopoly in the sale and manufacture of firearms and related technologies shipped in interstate commerce, as aforesaid, in the State of California and any other State of the United States.
- (2) To arbitrarily, unlawfully, unreasonably and knowingly raise, fix, control, act, stabilize and affect the price of firearms and related technologies shipped in interstate commerce, as aforesaid, into the State of California and any other State of the United States, and purchased by the U.S. Department of Defense and others, for and on behalf of the State of California, United States Government, and others.
- (3) Establish and maintain unreasonably high, excessive, monopolistic and non-competitive prices on firearms and related technologies shipped in interstate commerce, as aforesaid, into the State of California and other States, for purchase and use by the State of California, Department of Defense, and others, for and on behalf of the State of California, U.S. Department of Defense and others.
- (4) Arbitrarily, unlawfully, unreasonably and knowingly to prevent, suppress, and eliminate competition in the sale and manufacture of firearms and related technologies shipped in interstate commerce, as aforesaid, into the State of California and

- 251 -

any other State and others, through respective purchasing agents.

As a part of the unlawful monopoly, attempt to so monopolize, and combination and conspiracy to monopolize and pursuant thereto and in furtherance and to effectuate its object and purposes defendants herein named and diverse other persons, did:

- (1) through (9), inclusive subparagraphs of Paragraph IX of the SEVENTY-SECOND CAUSE OF ACTION of this complaint are hereby incorporated and adopted by reference to all allegations set forth by Plaintiff BRONSON.
- (10) In or about 1971, defendants army and firearms manufacturers, and each of them, and other defendants, organized and
  caused to be organized a criminal conspiracy against Plaintiff
  BRONSON to nationally suppress his newly invented firearms technologies and Patent, by not fairly analyzing, licensing, manufacturing, selling or shipping plaintiff's firearms technologies
  and Patent in interstate commerce to the State of California or
  Ronald Reagan-3007
- (11) In or about 1972, defendants firearms manufacturers, and each of them, and other defendants, organized and caused to be organized a criminal conspiracy against Plaintiff BRONSON to maintain national suppression of plaintiff's newly invented firearms technologies and Patent, by making illegal campaign contributions to the Nixon Reelection Campaign of thousands of dollars.
- (12) In or about 1972, defendants firearms manufacturers, and each of them, and other defendants, organized and caused to be organized a criminal conspiracy against Plaintiff BRONSON to maintain a national suppression of plaintiff's newly invented superior firearms technologies and Patent, by covering-up Army-Nixon Administration scandals concerning the technologically inferior M-16 rifle and other lifesaving technologies of plaintiff which would have shortened the Vietnam War and saved lives.

- 252 -

(13) 1 /When members of the law enforcement community inquired about improving the M-16 rifle with plaintiff's technology, defendant(s) conspired against, collaborated with, or coerced said law enforcement communities with threats to withhold that law enforcement community from consideration for training under defendant FEDERAL BUREAU OF INVESTIGATION, and others.

(14) Beginning in or about 1971, defendants firearms manufacturers, and others, conspired, agreed, understood, collaborated with and coerced among themselves and with others, the result of which was to destroy plaintiff's benefits and property in United States Patent No. 3,543,428, "Rifle Forestock", in the years from issuance of Patent. Plaintiff BRONSON now holds in reserve related technologies.

Ronald Reagan-3008

## Ronald Reagan-3009

(15.)In or about 1971, defendants ARIM and firearms manufacturers, and each of them, and other defendants, knowingly, wilfully, and maliciously conspired and agreed among themselves to destroy plaintiff's business, firearms and related technologies reputation, by threats of coercion, intimidation, defamation, economic reprisals, etc., against federal, state, county, city, local, or private firearms users, local sports and firearms dealers, local law enforcement, sports shooters, etc., in order to maintain economic and technological control and monopoly of the Sirearms industry. Local dealers were placed in fear for their own business economic health, that if dealers displayed and/or licensed and/or offered for sale Plaintiff BRONSON's firearms technology, the local dealers would "lose the Winchester line", "lose the Remington line", "lose the Colt line", etc. Defendants and each of them, intend to suppress plaintiff's Patent for the seventeen (17) years of plaintiff's proprietary ownership as granted by the United States Patent Office, and after seventeen years of defrauding plaintiff, take plaintiff's patent for "free". (16) In or about 1972, defendants FBI and MRA, and each of them, and other defendants, organized and caused to be organized

- (16) In or about 1972, defendants FBI and NRA, and each of them, and other defendants, organized and caused to be organized a criminal conspiracy against Plaintiff BRONSON to maintain a national suppression of plaintiff's newly invented superior firearms training technologies and Patent, by covering-up Army-Nixon Administration scandals concerning the technologically inferior M-16 rifle and other life saving technologies of plaintiff, which would have saved thousand of American lives in Vietnam and law officer lives in America, and which would have turned the tide for the winning of the Vietnam War for America.
- (17) In or about 1972, defendants WHITE HOUSE officials and FBI, and each of them, and other defendants, in return for WHITE HOUSE receipt of illegal campaign contributions toward the reelection of Mixon, organized and caused to be organized a crim-

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## Ronald Reagan-3010

1 inal conspiracy against Plaintiff ERONSON to nationally suppress plaintiff's firearms and related technologies, by assuring, con-3 | tinuing, maintaining, and otherwise effecting suppression of plain tiff's technologies:

- (a) By intimidation of, harassment of, coercion of, threats against, defamation, economic reprisals, political reprisals, social reprisals, and so on and on, against federal, state, city, county, local government, agencies or groups, and private individuals, agencies or groups.
- (ď) By intimidation of, harassment of, coersion of, threats of bodily harm, assault, illegal wiretap, destruction to business property and business reputation, and other wrongful acts against plaintiff complained of herein in this complaint.
- (18) In or about 1972, defendants ARMY and NATO General ALEXANDER HAIG, and each of them, and other defendants, organized and caused to be organized a criminal conspiracy against Plaintiff BROMSON to withhold from NATO plaintiff's new military technologies, and deny NATO newly efficient and superior lifesaving military programs, efficiency and security:
- (a) To suppress plaintiff's technologies and maintain mono-21 polies in restraint of trade with other defendants;
  - (¢) To suppress and cover-up of the scandalously technically inferior M-16 rifle from NATO and American mothers and fathers of sons who died needlessly in Vietnam, and the American public in general, and the fact that the Vietnam War could have been turned to a winning tide by plaintiff's firearms technologies;
  - (c) To suppress the fact that ranking generals of the UNITED STATES ARMY, due to commercial-industrial ties and collusions, betrayed America and America's fighting men and acted in treason in violation of the United States Constitution to coverup the inferior N-16 rifle by suppressing illegally Plaintiff EROJSON's efficient lifesaving technologies and Patent.

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(19) From about 1971, and continuing to present time, defendants U.S. ARMY and firearms manufacturers, and each of them, organized and caused to be organized a conspiracy and acts of suppression of plaintiff BRONSON's firearms and related technologies, the result of which denies to America still other technologies now held in reserve, but which in total would have contained the advance of Communism in Southeast Asia, and saved many thousands of American Marines and soldiers lives. This is treason on the part of the UNITED STATES ARMY, documented and evidenced, and several ranking ARMY officers and generals have, in fact, been traitors to the American public, flag and Constitution.

(a) The ARMY's absolute refusal to have any officer of the UNITED STATES ARMY communicate any interest or document in writing toward Inventor ERONSON's new "breakthrough maximum shocklong range .255 CKV Infantry Projectile Bullet for NATO, U.S. Marine Corps, U.S. Army, and Police-Law Enforcement. Breakthrough technology from AII has forged a ballistically superior projectile of long-range targetability in combination with a heretofore unrealized maximum and legal ballistic shock power at all combat ranges."

Ronald Reagan-3011

(20) In or about 1971, and continuing to present time, defendants, and each of them, organized and caused to be organized criminal conspiracy to falsely and maliciously restrain and suppress plaintiff's participation in business activities and trade and commerce in the firearms and related technologies' industries in competition and potential competition with defendants.

(21) In or about 1971, and continuing to present time, defendants, and each of them, organized and caused to be organized criminal conspiracy to cheat and defraud plaintiff of the use and enjoyment of plaintiff's Inventions, Patent and related firearms technologies' properties, through conspiracy, restraint of trade and commerce illegally, illegal campaign contributions, wiretap without warrant, assaults, violations of plaintiff's civil rights, negligences toward plaintiff, etc., and other wrongful acts against plaintiff complained of herein in this complaint, for the seventeen (17) years of plaintiff's Patent, and to continue until stopped by this Court.

- (22) In or about 1971, and continuing to present time, de\_fendants, and each of them, organized and caused to be organized a criminal conspiracy to falsely and maliciously interfere with plaintiff's business relations or advantages by intentional and improper methods of diverting or taking business from plaintiff which are not within the privilege of fair competition.
- (23) Plaintiff incorporates sub-paragraph (13) above, and states that on August 23, 1973, plaintiff's telephone communication with firearms manufacturer representative, an agent of Defendant FEDERAL BUREAU OF INVESTIGATION cut into the telephone conversation and stopped all transmission, and caused plaintiff's business telephone to be "out of order" for some time after the aborted telephone conversation. This firearms firm is now reductant to communicate with plaintRowfold Reagan-3012

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[14] On or flow: 1971, and doutinuing to prosent time, de-Tandanso, and each of them, organized and caused to be organized a oriminal conspiracy to maintain prices, costs, contracts, trade, commords, industry destrol, despessition availability, etc., paid by the State of California, U.T. Department of Defense, and others, for fileserms and related technologies were unreasonable and excessive and were dictated, controlled, set and fixed in the monopoly, attempt to monopolize, and the combination and conspiracy to monopolize in the manner set forth herein in sub-paragraphs (1) through (24), inclusive, of Paragraph VIII of plaintiff's SEVENTY-THIRD CAUSE OF ACTION.

III

The monopoly, attempt to monopolize and comination and conspiracy to monopolize, herein alleged was commenced and has been operated and carried on by said defendants, and each of them, during and throughout the period of time aforesaid and in pursuance thereof by said defendants named in this complaint, especially defendants and conspiracy and acts identified and incorporated herein from sub-paragraphs (1) through (24) , inclusive, of Paragraph WILL of the herein SEVENTY-THIRD CAUSE OF ACTION.

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Desendants, and each of them, sid do all of the acts, other acts, things, and other things, hereinbefore and hereinafter Ronald Reagan-3013 25 alleged.

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27 While said conspiracy, arrangement and understanding between 28 the defendants, and each of them, hamed herein was in emistence, 29 the U.S. Department of Defense, the State of California, and others, 30 purchased from defendants and defendant linearms manufacturers, 31 (and each of them, foling business is MINGHISTER CHRIERE, RIMINGTON 32 NAME, COLL DEDUCATION CEDEDAL LUBLACU DE LICIDATION LERIMINA

## Ronald Reagan-3014

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1 | HEADQUARTERS (QUANTICO, VIRGINIA), and others, firearms manufacturers and related industry activities, a total of billions of dollars for firearms and related technologies, which price was unreasonable and excessive due to the unlawful and illegal conspiracy, agreements and arrangements among the defendants, and each of them named herein to raise, fix, maintain, enhance and control said prices. The reasonable price at which said amount of firearms and related technologies could have been purchased under natural and free competitive conditions was millions of dollars less which will be demonstrated at trial. As a result of said conspiracy so existing at the time these purchases were made from said defendants, and each of them, plaintiff BRONSON and the State of California and any other State of the United States have suffered damage and injury in their property in actual amounts to be demonstrated at trial, and are entitled under Section 4 of the said Sherman Anti-Trust Act, Title 15, United States Code Annotated, Section 15, to threefold damages to be demonstrated at trial, and as incorporated herein under DAMAGES from page 274.

XII

WHEREFORE, plaintiff demands judgment against the defendants, and each of them, the sum and costs which shall be demonstrated at trial and treble damages, together with reasonable counsel fee, besides the costs and disbursements of this action; that a temporary restraining order and preliminary injunction may be issued out of this court upon its order directing the defendants, and each of them, and their agents, servants and employees, from in any manner interfering with the plaintiff in firearms and related technologies, and that after a trial of this cause that said injunction may be made perpetual; that a decree issue from the court that the contracts between defendant(s) which tended to create a wrongful monopoly in the firearms and related technologies industries in the States of California, Connecticut and

1 Delaware, in particular, and elsewhere, are void, and that all contracts wrongfully entered into between defendants, and each of them, are void.

#### XIII

WHEREFORE, plaintiff demands, pursuant to 15 U.S.C., Sec. 1 et seq., and Sec. 26, the following:

- 1. That a temporary restraining order and preliminary injunction may be issued out of this Court upon its order directing the defendants, and each of them, and their agents, servants and employees, from in any manner interfering with plaintiff in the firearms and related industries, and that after a trial of this cause that said injunction may be made perpetual;
- 2. For decree of this Court that the contracts between said defendants, and each of them, which tend to create a monopoly of the firearms and related industries are void, and that all contracts entered into between defendants, and each of them, and others, whereby users of plaintiff's firearms and related technologies would be forced into not doing business with plaintiff are void, defendants being the only source of business;
- 3. For a decree ascertaining the damages suffered by plaintiff by reason of the unlawful acts of the defendants herein complained of, and awarding judgment in favor of the plaintiff and against the defendants, and each of them, for thrice the amount of said damages, costs, and a reasonable attorney's fee;
- That a decree issue from the Court that the contracts between defendant(s) which tended to create a wrongful monopoly in the firearms and related technologies industries in the States of California, Connecticut and Delaware, in particular, and elsewhere, are void, and that all contracts wrongfully entered into 30 between defendant(s) are void.

Ronald Reagan-3015

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## SEVENTY-FOURTH CAUSE OF ACTION

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plaintiff brings this civil action seeking treble damages and injunctive relief for injuries and threatened and continuing injuries to his business, property and trade caused by defendants' monopolistic practices, unreasonable comspiracies and restraints of trade and other violations of the Sherman and Clayton Acts for jurisdiction of this Court under 15 USC \$\$15,26,1,2,13,18; and 28 USC \$1337.

II

plaintiff does hereby incorporate and adopt by reference, all allegations set forth herein, hereinafter and hereinbefore complained of for interference with interstate commerce and competition.

III

Plaintiff GEORGE A BRONSON is President of Anchor International, Inc., a California corporation, having its principal place of business in Sacramento, California. Plaintiff is a Yale graduate Inventor and Patent Holder of Record in the United States, NATO and other allied countries. Plaintiff is the Inventor and Patent Holder of United States Patent No. 3,543,428, author and owner of proprietary, new, efficient lifesaving technologies selectively published in "ANCHOR INTERNATIONAL WEAPONS TRAINING FIRING MANUAL AND BRONSON STRINGFIRE METHOD".

IV

Defendants are found andtransact business in States of Maryland, Virginia, Delaware, New York, California, Washington, D.C., Connecticut, and elsewhere. Ronald Reagan-3016

v

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

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## Defendants are:

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1. Def. UNITED STATES ARMY, headquarters The Pentagon, Washington, D.C., for the Aberdeen Proving Grounds, Aberdeen, Maryland, and elsewhere.

- 2. Def. WINCHESTER-WESTERN DIVISION of the OLIN CORPORATION, 7 | Stamford, Connecticut.
  - 3. Def. REMINGTON ARMS DIVISION of the DUPONT DE NEMOURS CORPORATION, Wilmington, Delaware.
- 4. Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTOR'S L.P. GRAY 11 WILLIAM RUCKELSHAUS, CLARENCE M. KELLEY, headquarters Washington, 12 D.C.
- 5. Def. NATIONAL RIFLE ASSOCIATION of AMERICA, 1600 Rhode 14 Island Avenue, N.W., Washington, D.C.
  - 6. Def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION of the UNITED STATES DEPARTMENT OF JUSTICE, headquarters Washington, D.C.
  - 7. Def. INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE, INC., 18 headquarters 11 Firstfield Road, Gaithersburg, Maryland.
  - 8. Def. NATIONAL SHERIFFS ASSOCIATION, 1250 Connecticut Ave-20 nue, N.W., Washington, D.C., headquarters.
  - 9. Defs. NIXON ADMINISTRATION WHITE HOUSE OFFICIALS, 1600 22 Pennsylvania Avenue, Washington, D.C.
    - 10. Def. COLT INDUSTRIES, INC., headquarters New York City.
    - 11. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J.
  - 25 YOUNGER and GOVERNOR RONALD REAGAN, State Capitol, Sacramento, CA.
    - 12. Def. LOS ANGELES CITY AND COUNTY, SHERIFF PETER PITCHESS, LOS ANGELES POLICE CHIEF EDWARD DAVIS, Los Angeles, California.
    - 13. Def. SACRAMENTO COUNTY, SHERIFF DUANE LOWE, DISTRICT AT\_ TORNEY JOHN PRICE, 720 - 9th Street, Sacramento, California.
    - 14. Def. CITY OF SACRAMENTO, SACRAMENTO POLICE, CHIEF WILLIAM Ronald Reagan-3017 J. KINNEY,

ORIGINAL

15. Def. FEDERAL PROTECTIVE SERVICE, OFFICERS CHASTAINE, CLEMONS and SNELSON, Sacramento, California.

- 16. Def. STATE OF CALIFORNIA, CALIFORNIA HIGHWAY PATROL, COMMISSIONER GLENDON B. CRAIG, headquarters Sacramento, California.
- 17. Def. STATE OF CALIFORNIA, STATE POLICE, OFFICERS WESTON and SHERWOOD, CHIEF GUY R. OATES, headquarters Sacramento, CA.
- 18. Def. STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, Jr., MARC POCHE, State Capitol, Sacramento, California.

Ronald Reagan-3018

VI

Plaintiff was to have been engaged in the business of firearms and related technologies from 1971 forward. Defendant(s) stopped plaintiff from engaging in this business in interstate commerce between the various states and developing and expanding plaintiff's business, details more fully set forth as follows.

#### VII

Plaintiff had developed a potentially large and profitable business among its customers, to wit, sports shooting, law enforcement, related technologies, in the markets of various states of the United States, and plaintiff was about to enjoy a lucrative and profitable business and increase its profits and prosper accordingly.

## VIII

Defendant(s) combined and organized in an association consisting of federal, state, county and city government officials, agents, employees or servants, firearms manufacturers, public utilities, and members of the weapons training industry, and consisted of individuals, firms, and corporations engaged in military, law enforcement and sport shooting activities and supportive services, with its membership composed of those defendant(s) participating and acting in federal funding blackmail to suppress plaintiff and plaintiff's technologies.

# Ronald Reagan-3019

All of the defendants herein violated the provisions of the act of Congress passed July 2, 1890, entitled "An Act to protect trade and commerce against unlawful restraints and monopolies, " in that they are engaged in a combination and conspiracy to place unlawful restraints upon the trade and commerce in firearms, related technologies, lawenforcement, military and NATO weapons training technologies between the several states and territories

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of the United States and between the United States and the

Dominion of Canada.

The combination and conspiracy herein complained of have been in continuous existence since about 1971 and have been participated in for varying periods and in varying degrees by each of the defendants herein named, and also by a large number of individuals not named as defendants herein. The initial step in furtherance of the conspiracy was the organization of illegal campaign contributions to the NIXON ADMINISTRATION to suppress plaintiff's technology from use within the federal government, followed by use of the LAW ENFORCEMENT ASSISTANCE ADMINISTRATION, and others, for funnelling federal funds to defendant(s) in federal funding plackmail and payoff and bribe for not implementing plaintiff's technologies.

X

XI

From the time of the organization of the voluntary association hereinbefore described, in 1971, to the time of the filing of this petition, various measures were adopted by the voluntary association and by the successive officers, directors, officials, agents, employees or servants, of the association, in furtherance of the combination and conspiracy hereinbefore alleged. Among such measures are the following:

- 1. Beating, strangulation, handcuffing, false imprisonment, etc., of plaintiff, August 22, 1975.
- Assaults and threats of plaintiff while being stalked,
   "dogged", followed, from 1971 to present.
  - 3. Illegal wiretapping on or about 1971 to present.
- 4. Electronic disruption of plaintiff's business telephone communications by illegal wiretap, and other warrantless search.
- 5. Threatening plaintiff with deadly weapons, including drawn pistols, rifles and shotguns, government automobiles and Ronald Reagan-3020 planes, as well as fists.

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As a result of the combination and conspiracy hereinbefore alleged and of the various acts done in pursuance thereof by defendants herein and others, as above alleged, the power and influence of the defendant(s), and each of them, has been greatly increased, its membership grown.

#### YTTT

As a further and direct result of said combination and conspiracy, interstate trade and commerce in firearms and related technologies is restrained and prevented in such a manner and to such an extent that plaintiff is not allowed to conduct his business with any one in the industry, even other than defendant(s).

## VIX

The aforesaid acts, and acts incorporated herein from all of plaintiff's CAUSES OF ACTION herein, hereinafter and hereinbefore complained of, on the part of the defendants were in restraint of trade and did constitute a monopoly and were and are an attempt to monopolize, and by reason of plaintiff's loss of customers and legitimate profit, and for other acts forbidden by the anti-trust laws, plaintiff was restricted in its trade and competition with the other members of the firearms and related technologies industry, all of which was injurious to this plaintiff and excluded this plaintiff from competition in the trade, and because of such inability to compete in the market during the period herein mentioned, by reason of the foregoing, it has been damaged in that its property has been lost, its business rendered unprofitable, and the profits of its trade have yet to materialize.

## Ronald Reagan-3021

WHEREFORE, plaintiff demands judgment against the defendants, and each of them, for the sum to be proved at trial, and for treble damages, together with reasonable counsel fee, besides the 32 | costs and disbursements of this action, that I temporary restraining order and preliminary injunction may be issued out of this Court upon its order directing the defendants, and each of them, and their agents, servants and employees, from in any manner interfering with the plaintiff in firearms and related technologies, and that after a trial of this cause that said injunction may be made perpetual; that a decree issue from the Court that the contracts between defendant(s) which tended to create a wrongful monopoly in the firearms and related technologies industries in the States of California, Connecticut and Delaware, in particular, are void, and that all contracts wrongfully entered into between defendant(s) are void.

Ronald Reagan-3022

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#### SEVENTY-FIFTH CAUSE OF ACTION

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Plaintiff brings this civil action seeking treble damages and injunctive relief for injuries and threatened and continuing injuries to his business, property and trade caused by defendants' monopolistic practices, unreasonable comspiracies and restraints of trade and other violations of the Sherman and Clayton Acts for jurisdiction of this Court under 15 USC \$\$15,26,1,2,13,18; and 28 USC \$1337.

II

plaintiff does hereby incorporate and adopt by reference, all allegations set forth herein, hereinafter and hereinbefore complained of for interference with interstate commerce and competition.

III

Plaintiff GEORGE A BRONSON is President of Anchor International, Inc., a California corporation, having its principal place of business in Sacramento, California. Plaintiff is a Yale graduate Inventor and Patent Holder of Record in the United States, NATO and other allied countries. Plaintiff is the Inventor and Patent Holder of United States Patent No. 3,543,428, author and owner of proprietary, new, efficient lifesaving technologies selectively published in "ANCHOR INTERNATIONAL WEAPONS TRAINING FIRING MANUAL AND BRONSON STRINGFIRE METHOD".

VI

Defendants are found andtransact business in States of Mary-land, Virginia, Delaware, New York, California, Washington, D.C., Connecticut, and elsewhere. Ronald Reagan-3023

V

plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

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## Defendants are:

- 1. Def. UNITED STATES ARMY, headquarters The Pentagon, Washington, D.C., for the Aberdeen Proving Grounds, Aberdeen, Maryland, and elsewhere.
- 2. Def. WINCHESTER-WESTERN DIVISION of the OLIN CORPORATION, Stamford, Connecticut.
- 3. Def. REMINGTON ARMS DIVISION of the DUPONT DE NEMOURS CORPORATION, Wilmington, Delaware.
- 4. Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTORS L.P. GRAY 10 WILLIAM RUCKELSHAUS, CLARENCE M. KELLEY, headquarters Washington, 12 D.C.
- 5. Def. MATIONAL RIFLE ASSOCIATION of AMERICA, 1600 Rhode 14 Island Avenue, N.W., Washington, D.C.
- 6. Def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION of the 16 UNITED STATES DEPARTMENT OF JUSTICE, headquarters Washington, D.C.
- 17 7. Def. INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE, INC., 18 headquarters 11 Firstfield Road, Gaithersburg, Maryland.
- 19 8. Def. NATIONAL SHERIFFS ASSOCIATION, 1250 Connecticut Ave-20 nue, N.W., Washington, D.C., headquarters.
- 21 9. Defs. NIXON ADMINISTRATION WHITE HOUSE OFFICIALS, 1600 22 Pennsylvania Avenue, Washington, D.C.
- 10. Def. COLT INDUSTRIES, INC., headquarters New York City. 23
- 11. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J. 24 25 YOUNGER and GOVERNOR ROMALD REAGAN, State Capitol, Sacramento, CA.
- 12. Def. LOS ANGELES CITY AND COUNTY, SHERIFF PETER PITCHESS, 26 LOS ANGELES POLICE CHIEF EDWARD DAVIS, Los Angeles, California. 27
- Def. SACRAMENTO COUNTY, SHERIFF DUANE LOWE, DISTRICT AT\_ 13. 28 TORNEY JOHN PRICE, 720 - 9th Street, Sacramento, California.
- 14. Def. CITY OF SACRAMENTO, SACRAMENTO POLICE, CHIEF WILLIAM 30 Ronald Reagan-3024 31 J. KINNEY,

ORIGINAL

15. Def. FEDERAL PROTECTIVE SERVICE, OFFICERS CHASTAINE, CLEMONS and SNELSON, Sacramento, California.

- 16. Def. STATE OF CALIFORNIA, CALIFORNIA HIGHWAY PATROL, COMMISSIONER GLENDON B. CRAIG, headquarters Sacramento, California.
- 17. Def. STATE OF CALIFORNIA, STATE POLICE, OFFICERS WESTON and SHERWOOD, CHIEF GUY R. OATES, headquarters Sacramento, CA.
- 18. Def. STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, Jr., MARC POCHE, State Capitol, Sacramento, California.

The acts herein alleged to have done by defendants have resulted in the restraining of interstate commerce in Washington, D.C., Quantico, Virginia, Sacramento, California, Los Angeles, California, and elsewhere, and have tended to, and actually created a monopoly in the line of interstate commerce within these areas and elsewhere; and plaintiff herein has been injured in his business and property by reason of the doing of those acts in violation of the anti-trust laws.

VI

Ronald Reagan-3025

The predominant manufacturing and sale of firearms and re-

lated technologies takes place in the States of Connecticut and

gies is accomplished in offices located at various strategic

Massachusetts. The distribution of firearms and related technolo-

points in the United States, variously known \*\* "gunshops, hard-

arms and its related technologies involve the transportation of

volve and constitute interstate commerce.

ware stores", etc. Both the manufacture and distribution of fire-

firearms and related technologies in interstate commerce, and in-

## VIII

Normally contracts for firearms manufacture and/or deliveries are called "license agreements", and grant to the licensee the right to manufacture and/or sell under "license agreement" said firearm(s) "line". The "license agreement" provides for the manufacture and/or delivery of the firearm(s) "line" to the licenseedistributor-retailer. "License agreements" are normally made for one year, renewable, are in writing, and in each instance signed by the manufacturer or his representative and licensee under the terms thereof. These license agreements provide for the compensation which shall be paid to the licensee, which may be a fixed amount or a percentage or some other arrangement. The manufacturer or his representative normally solicits from the licensee the license agreement.

IX

Defendants WINCHESTER WESTERN/OLIN and REMINGTON ARMS/DUPONT are substantial and dominant manufacturers of rifles and shotguns. Defendant COLT is a substantial and dominant manufacturer of pistols, and the prime contractor and manufacturer of the U.S. ARMY infantry rifle, the M-16. There are smaller manufacturers and sellers of firearms, many of whom manufacture under sub-contracts to defendants WINCHESTER, REMINGTON, COLT, and others.

 $\mathbf{x}$ 

Defendants control the release and distribution of each of his "line" of firearms, and it is impossible to successfully operate a "gun shop, hardware store, sporting goods store", etc.,particularly in a city like Sacramento, without obtaining at least one of the defendant's firearms "line".

Ronald Reagan-3026

XI

From 1968 forward, plaintiff organized a California corporation, and after being granted United States Patent No. 3,543,428, "Rifle Forestock", proceeded to develop lists of clients, fire-

arms manufacturers, and retail dealers, with whom to license the manufacturing and/or sale of plaintiff BRONSON's newly patented technology, and plaintiff invested sums to that end.

XII

The defendants, well knowing each and all of the above facts, thereby entered into a conspiracy with each other to prevent plaintiff's "rifle forestock" and related technologies from being successfully licensed, manufactured, sold or used, and to destroy the entire value of plaintiff's "rifle forestock" patent and related technologies, and to destroy plaintiff's investment, and to force plaintiff to lose his benefits from grant of seventeen (17) years of patent protection, by preventing plaintiff or any other person desiring to "license" with plaintiff from having access to defendants' "lines" of firearms, distributed by them in interstate commerce, here described, so that for want or lack of such "lines", any user/licensee of plaintiff's firearms technologies and "rifle forestock" would be compelled to sell his and plaintiff's business at a sacrifice and great loss.

Ronald Reagan-3027

XIII

To that end, and for that purpose, the defendants connived and conspired with each other to do and make, and pursuant to the conspiracy did and made, the following acts and contracts, all of which were done and made for the purpose of preventing the plaintiff or any one else from license, manufacture or sale of plaintiff's "rifle forestock" and related technologies, and thereby destroying plaintiff's and any one else's business. Among the things defendants did are the following:

- l. Defendants negotiated, and caused to be negotiated, for the year beginning 1971 to present, contracts with defendant U.S. ARMY to coverup the inferior, inefficient, ineffective M-16 infantry rifle.
  - 2. Defendants negotiated, and caused to be negotiated, for

- 271 -

the year beginning 1971 to present, illegal campaign contributions to the NIXON ADMINISTRATION to make it impossible for plaintiff to license or in any way conduct business with the UNITED STATES GOVERNMENT AND any agency thereof.

- 3. Defendants negotiated, and caused to be effected under threat of losing a "line" of firearms, suppression and nonlinensing of plaintiff's technologies from among retail dealers.
- 4. Defendants negotiated, and caused to be effected, from political or funding blackmail acts, state, county and city governments' suppression and nonimplementation of plaintiff's new lifesaving firearms technologies.
- 5. Defendants negotiated, and caused to be effected, the libel, slander and discrediting of plaintiff in his professional reputation in the firearms industry and elsewhere.
- 6. Defendants negotiated, and caused to be effected, the assault, batter, handcuffing, strangulation, false imprisonment, false arrest, illegal search and seizure, etc., of plaintiff as herein, hereinafter, and hereinbefore complained of.
- 7. Defendants negotiated, and caused to be effected, the illegal and warrantless wiretapping of plaintiff, and the defendant FBI disconnection of and disrupting plaintiff's business telephone communications, particularly within the firearms industry.

  Ronald Reagan-3028

XIV

Each and all of those acts were conceived and carried out with the sole purpose of preventing any person from license agreements with plaintiff by threatening the loss of firearms "lines", so that no potential licensee would want to deal or enter into license with plaintiff and thereby destroy plaintiff's business.

XV

These acts and conspiracy on the part of the defendants were successful, and as a result thereof, plaintiff was not able to

- 272 -

obtain sufficient interest to license successfully, and was not able to license as plaintiff otherwise would, and could have, and plaintiff became and was financially embarrassed and scaled-down the operation of his business.

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Each and every one of the acts of the defendants hereinbefore alleged, were each and all intended to be by the defendants, and were conceived and carried out for that purpose, and were in restraint of trade and commerce among the states in the United States, and constituted, and were intended by them, and were in effect, a combination and conspiracy in restraint of trade and commerce among the several states, in that they were intended to and did prevent the plaintiff and any person from entering into contracts or licensing agreements for firearms and related technologies; and each and every one of said acts were in violation of said Sherman Anti-trust Act and the Clayton Anti-trust Act, and do and did create and produce and constituted a monopoly, and were intended to, and had the effect of an attempt to, monopolize the distribution, manufacture, sale and license of firearms and related technologies in the United States, all of which was and is injurious to plaintiff, and prevented plaintiff from either using his "rifle forestock" and related technologies, or licensing the same, as plaintiff could and would have done, except because of said conspiracy; and because of the inability to compete in the market by reason of the foregoing, the said acts and each of them did prevent the free flow of "rifle forestocks" and related technologies in commerce among the several states. Ronald Reagan-3029

XVII

As a result of said combination, conspiracy, and various acts done in pursuance thereof, as hereinbefore and hereinafter alleged, by the defendants therein, it did become impossible to manufacture, sell or license plaintiff's "rifle forestock" and related tech-

nologies successfully; and the years since issuance of patent,

U.S. Patent No. 3,543,428, "Rifle Forestock", was wholly destroyed,

and the value of plaintiff's investment in said "rifle forestock"

and related technologies was wholly destroyed, and plaintiff has

been damaged in amounts to be proved at trial, and as incorporated

herein under DAMAGES from page 274.

#### XVIII

WHEREFORE, plaintiff prays judgment against the defendants, and against each of them, for damage and sums to be proved at trial, for treble damages, as provided by said Clayton Amendment to said Sherman Anti-trust Act, together with = reasonable counsel fee, and besides the costs and disbursements of this action; that metemporary restraining order and preliminary injunction may be issued out of this Court upon its order directing the defendants, and each of them, and their agents, servants and employees, from in any manner interfering with the plaintiff in firearms and related technologies, and that after a trial of this cause that said injunction may be made perpetual; that m decree issue from the Court that the conspiracies and contracts between defendant(s) which tended to create a wrongful monopoly in the firearms and related technologies industries in the States of California, Connecticut, and Delaware, in particular, and elsewhere, are null and void, and that all conspiracies and contracts wrongfully entered into between defendants, and each of them, are null and void. Ronald Reagan-3030

\* \* \* \* \*

Defendants, and each of them, in plaintiff BRONSON's FIRST through SEVENTY-FIFTH CAUSES OF ACTION and incorporated herein, wrongfully exceeded their scope of employment and did not use due care toward plaintiff. Defendants, and each of them, at all times operated within the authority of employment and, therefore, in one sense operated within scope of employment but at the

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## Ronald Reagan-3031

same time wrongfully exceeded and wrongfully abused the <u>legal</u> scope of employment which the Court is asked to note.

At no time can officials, federal, state or other, act illegally and damaging to others and legally and genuinely be "within the scope of employment"; however, from the days of John Edgar Hoover and the FBI's origination of this "scope of employment" idea to protect FBI agents, the public at large is stuck with a double entendre in legal phraseology and the Court is asked to most carefully differentiate between being on the job "8 hours a day" and operating legally and honestly in that same "8 hours a day".

From the days of the Watergate scandals, of which this case is an aftermath, various federal officials tried to evade the responsibility of the law by this "within the scope of employment" idea. On the one hand they tried to say that federal agencies and higher officials and the United States itself were not liable, that only the individual can be sued for not operating within the scope of employment.

Rephrased, American Constitutional Justice is a fraud if federal, state and county officials can operate illegally, wrongfully and against American Justice, damaging citizens, and claim they operate within the scope of employment. The True Law is that when an official or agency performs or functions in a competent lawful manner with due care, under the law, then they have some substance to stating that they are doing Government's good work by law and therefore are not prosecutable.

But as soon as they become corrupt, damaging, extra legal, conspiratorial, outside and exceeding the law, they are not immune from prosecution and statutes so state, and plaintiff so charges the defendants named herein, and each of them, and others, with fraud, corruption, malice, and conspiracy and acts in violation of Federal Law and Constitution.

13.

\* \* \* \* \* \*

WHEREFORE, Plaintiff GEORGE A. BRONSON demands judgment against defendants, and each of them, the sum and costs of which shall be proved at trial, and for damages, treble damages, compensatory and punitive damages, injunctions, permanent injunctions, and temporary restraining orders, and for such other relief as is deemed just and proper by this Court.

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Ronald Reagan-3032

#### DAMAGES

WHEREFORE, plaintiff prays for a joint and several judgment against defendants, and each of them, for all causes of action 4 herein complained of, as follows:

- 1. For general damages in the sum of FORTY SEVEN MILLION DOLLARS (\$47,000,000.00);
- 2. For medical and allied expenses and impairment of earning capacity according to proof;
- 3. For punitive damages in the sum of THIRTY MILLION DOLLARS (\$30,000,000.00);
  - 4. For costs of litigation incurred herein; and
- 5. For such other and further relief as the Court may deem just and proper.

#### DEMAND FOR JURY TRIAL

The plaintiff in the herein entitled civil action requests a trial by jury as guaranteed by the Seventh Amendment to the Constitution of the United States and as provided by Federal Rules of Civil Procedure, Rule 38.

EXECUTED: May 10, 1978, at Sacramento, California.

IN PROPRIA PERSONA

Post Office Box 588

Sacramento, California 95803

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Ronald Reagan-3033

#### VERIFICATION

I, GEORGE A. BRONSON, the undersigned, declare under penalty of perjury that I am the plaintiff in the within AMENDED COMPLAINT (CONSPIRACIES AND ACTS IN VIOLATION OF CONSTITUTIONAL RIGHTS AND CIVIL RIGHTS, ANTI-TRUST LAWS; UNLAWFUL INTERFERENCE WITH BUSINESS AND TRADE RELATIONS; ASSAULT, BATTERY, MAYHEM AND ATTEMPTED MURDER, MISUSE OF POLICE POWER, FRAUD, LIBEL, SLANDER, ILLEGAL TELEPHONE INTERFERENCE AND WIRETAPS, UNLAWFUL SEIZURE AND IMPRISONMENT, CONSPIRACY TO OBSTRUCT JUSTICE; DAMAGE TO BUSINESS PROPERTY, INCOME, REPUTATION, TRADE; CONSPIRACY IN THE COMMISSION OF FEDERAL FUNDING BLACKMAIL.), that I am familiar with the contents thereof, and that the contents are true and correct to the best of my knowledge and belief.

EXECUTED on May 10, 1978, at Sacramento, California.

GEORGE A. BRONSON Plaintiff.

STATE OF CALIFORNIA )
) SS
COUNTY OF SACRAMENTO )

On this the 10th day of May, 1978, before me, the undersigned Notary Public appeared personally, GEORGE A. BRONSON, known to me to be the person whose name is subscribed to the within instrument and acknowledged that he executed the same for the purposes therein contained.

IN WITHESS WHEREOF, I hereunto set my hand and official seal.



Jayer O. France

Ronald Reagan-3034

TO:

DIRECTOR, FBI

ATTN: OFFICE OF LEGAL COUNSEL

FROM:

SAC, SACRAMENTO (197-5) (P)

ALL INFORMATION CONTAINED
PREEIN IS UNCLASSIFIED

BY SSMALO3RDY

SUBJECT:

GEORGE A. BRONSON

VS. THE UNITED STATES OF AMERICA;
GOVERNOR EDMUND G. BROWN, JR.;
FEDERAL BUREAU OF INVESTIGATION AND
DIRECTORS I.P. GRAY, CLARENCE KELLEY,
WILLIAM RUKKELHAUS; U.S. DEPT. OF
JUSTICE, U.S. ATTORNEYS DWAYNE KEYES,
DONALD HELLER; U.S. TREASURY DEPT.,
SECRET SERVICE; FEDERAL PROTECTIVE
SERVICE/GSA, DIRECTOR, OFFICERS CLEMONS
(BADGE 3327), DAMES CHASTAINE, CLARENCE
L, SNELSON; LUV SECURITY SERVICE, OFFICERS

GREER AND W.W. SMITH; LEON JAWODSKI; GEN. ALEXANDER HAIG; STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER, STATE CONTROLLER HOUSTON I. PLOURNOY, MARC POCHE, CALIFORNIA HAGIWAY PATROL,

COMMISSIONER GLENDON B CRAIG, STATE POLICE, CHIEF GUY R. OATES, OFFICERS L.D. SHERWOOD AND S.W. WESTON, RONALD BEAGAN;

LAW ENFORCEMENT ASSISTANCE ADMIN., U.S. ARMY; WINCHESTER OLIN CORP., REMINGTON/DUPONT CO.;

COLT INDUS.; SACRAMENTO COUNTY, SHERIFF

DUANE LOWE, D.A. JOHN PRICE CITY OF SACRAMENTO, POLICE DEPT. CHIEF W.J. MINNEY, NRA; TACP;

NAT' L SHERIFF'S ASEN; ATET, PACIFIC TELEPHONE; WESTERN UNION; SMUD; L.A. COUNTY, SHERIFF

PLICHESS; CIPY OF L.A., MAYOR T. BRADLEY, CHIEF ED. DAVIS; and JOHN DOES ONE THROUGH

ONE HUNDRED

EDC; SACRAMENTO, CA.

CIVIL ACTION NO. 5-7

CIVIL ACTION OO: SC

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3 - Bureau

2 - New Orleans (Enc. 1) (ATTN: SA THOMAS RAY)

2 - Seattle (Enc. 1) (ATTN: SAC JOHN M. REED)

2 - Sacramento

MJM:slm

(9) Ronald Reagan-3035

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SEARCHED\_\_\_\_INDEXED\_\_\_\_\_
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HERMAN SILLAS United States Attorney

JAMES S. JOINER Assistant U. S. Attorney

> 2058 Federal Building 650 Capitol Mall Sacramento, California 95814 Telephone (916) 440-2425

ORIGINAL FILED

JUN 26 1978

CLERK, U. S. DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA

DEPUTY CLERK

Attorneys for the Defendant United States of America

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

GEORGE A. BRONSON,

Plaintiff,

V.

THE UNITED STATES OF AMERICA, et al.,

Defendants.

NOTEN OF WILLIAMS e e i per **en**i BYSSA9863RDD K

CIVIL NO. S-76-447-PCW

NOTICE OF MOTION AND MOTION TO DISMISS

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Notice is hereby given that on August 28, 1978 at 10:00 a.m. or as soon thereafter as the matter may be heard, in Courtroom No. 2 of the United States District Court for the Eastern District of California, 650 Capitol Mall, Sacramento, California, defendant The United States of America, will move the Court to dismiss the above-captioned Amended Complaint for failure to comply with Rule 8 of the Federal Rules of Civil Procedure.

#### MOTION TO DISMISS

The United States of America hereby moves the Court for an Order dismissing plaintitff's Amended Complaint in the above-captioned matter for failure to comply with Rule 8 of the Federal Rules of Civil Procedure.

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Ronald Reagan-3039

FORM 03D-34 Formerly LAA-94

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CC: DJ 6/26/78

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CLERK, U. S. DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA

BY \_\_\_\_\_\_\_DEPUTY CLERK

HERMAN SILLAS United States Attorney

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JAMES S. JOINER Assistant U. S. Attorney

2058 Federal Building 650 Capitol Mall Sacramento, California 95814 Telephone (916) 440-2425

Attorneys for the Defendant United States of America

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

GEORGE A. BRONSON,

Plaintiff,

v.

THE UNITED STATES OF AMERICA, et al.,

Defendants.

DATE 5/8/96 BY SSAGRASED DATE 5/8/96 BY SSAGRASED DATE 5/8/96

CIVIL NO. S-76-447-PCW

REQUEST FOR AN EXTENSION OF TIME

Pursuant to F.R.Civ.P. 6(b)(1) it is hereby requested that the following persons be granted an extension of time in which to present a responsive filing in the above-captioned case.

Attorney's Office in any capacity as attorney of record or attorney in fact on behalf of the persons listed. Each of the persons listed has requested representation by the United States Department of Justice. The Department of Justice has requested reports on the allegations in plaintiff's Complaint which, when received, will provide the basis for a decision concerning representation. The purpose of this request is solely to enable the Department of Justice sufficient time to make such a decision. Thus, this request is not intended to be, nor should be, construed as a waiver

502% 03D-94 8-8-74 Formerly LAA-94

U.S.CPO: 1975-575-986

-1-

	<b>  </b>
1	of any rights, defenses or jurisdictional requirements.
2	Those persons who are the subject of this request
3	are: Clarence Snelson
4	General Alexander Haig
5	William Ruckleshaus
6	Clarence Kelley
7	L. Patrick Gray
8	Leon Jaworski
9	Dwayne Keyes
10	Donald Heller
11	James Chastaine
12	Leroy Clemons
13	Walter Smith
14	Steven Greer
15	DATE: June 29, 1978
16	HERMAN SILLAS
17	United STates Attorney
18	Oremes & Oginer
19	JAMES S. JOINER Assistant U. S. Attorney
20	industrial of the field including
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F0RM 03D-94 8-8-74 Formerly LAA-94 UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

GEORGE A. BRONSON,

Plaintiff,

V.

CIVIL NO. S-76-447-PCW

THE UNITED STATES OF AMERICA, et al.,

Defendants.

ORDER

It is hereby ordered that the following persons may file a response to plaintiff's Amended Complaint on July 31, 1978, or ten (10) days after a decision by the United States Department of Justice concerning representation, whichever date shall come first.

General Alexander Haig Steven Greer

William Rucklehaus Clarence Snelson

Clarence Kelley Walter Smith

L. Patrick Gray Leroy Clemons

Leon Jaworski James Chastaine

Dwayne Keyes Donald Heller

Said persons are required to file a response by July 31, 1978 or sooner since said date is the final date for filing a motion pursuant to Local Rule of Practice 113(b) to be heard

FORM 08D-94 8-8-74 Formerly LAA-94

U.S.GPO: 1975-575-988

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Ronald Reagan-3049

on August 28, 1978, the date designated by this Court for hearing various motions by defendants.

DATE: JUL 5 1978

PHILIP C. WILKINS

UNITED STATES DISTRICT JUDGE

-2-

Ronald Reagan-3050

Formerly LAA-94
U.S.GPD: 1975-575-985

FORM 03D-94

#### CERTIFICATE OF SERVICE BY MAIL

EORGE A. BRONSON	, )		•
,	Plaintiff,	•	
v.	<i>).</i>	CIVIL NO.	S-76-447-PCW
THE UNITED STATES	OF )		
MERICA, et al.,			
	Defendants.)		to provide the second of the s

The undersigned hereby certifies that she is an employee in the

Office of the United States Attorney for the <u>Eastern</u> District

of <u>California</u> and is a person of such age and discretion

as to be competent to serve papers.

That on July 6, 1978 she served a copy of the attached REQUEST FOR AN EXTENSION OF TIME - CIVIL NO. S-76-447-PCW & ORDER

by placing said copy in a postpaid envelope addressed to the person(s) hereinafter named, at the place(s) and address(es) stated below, which is/are the last known address(es), and by depositing said envelope and contents in the United States Mail at Sacramento, California.

### Addressee(s):

George A. Bronson P. O. Box 588 Sacramento, CA 95804

Darryl Doke, Esq.
Deputy Attorney General
State of California
555 Capitol Mall, Suite 350
Sacramento, CA 95814

Westley & Callahan 300 University Avenue Suite 207 Sacramento, CA 95825

Mike Twibell J. Edgar Hoover Bldg. Room 7338 Washington, D. C. 20535 Major Q. Richardson Army JAG Office Of The Judge Advocate General Washington, D. C.

Mike McCrystle Federal Bureau of Investigation 2800 Cottage Way Sacramento, California

Mr. Steven Greer 2257 Hurley Way, Apt. #55 Sacramento, California 95825

Mr. Dwayne Keyes Suite 134 Connors Bldg. 1100 West Shaw Avenue Fresno, California 93711

DOJ-

Ronald Reagan-3051

Floured & Harlemeyer

Addressees - Continued

Mr. Donald Heller 1220 H Street, Suite 201 Sacramento, California 95814

Gibson, Dunn & Crutcher 515 South Flower Street Los Angeles, California 90071

Mr. Walter W. Smith 7406 Sagemount Way Citrus Heights, California 95610

197-5-18 W W FBI - SACKMONTON O

# ORIGINAL

AUG 3 0 1978

CLERK, U. S. DIST. COURT Eastern District of California

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

ADJACTOR OF A CONTAINED

SAAL

GEORGE A. BRONSON,

Plaintiff,

Civ. No. S-76-447 PCW

UNITED STATES OF AMERICA, et al.,

Defendants.

### MEMORANDUM AND ORDER

The above-entitled action, filed in <u>pro per</u>, consists of a two hundred and ninety-one (291) page "Amended Complaint," alleging 75 causes of action against more than 50 defendants. Plaintiff seeks \$77,000,000 in damages for violation of his civil rights, as well as injunctive relief against alleged antitrust violations. All defendants, by their respective attorneys, have made various motions to dismiss the amended complaint pursuant to Rule 12 of the Federal Rules of Civil Procedure (FRCP), as well as to dismiss for failure to comply with FRCP Rule 8. These motions were heard at the Court's August 28, 1978 calendar.

Although the Rule 12 motions are based on differing grounds for each of the defendants, the asserted Rule 8 violation as a ground for dismissal is a common thread linking all the defendants. After thorough consideration of the pleadings, multitudinous briefs, and oral presentations at the calendar

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hearing, the Court is of the opinion that the amended complaint must be dismissed for failure to comply with Rule 8. However, the Court will grant plaintiff leave to further amend his complaint, subject to certain legal ground rules more fully detailed below.

It would appear from the amended complaint that plaintiff's basic grievance stems from his inability to gain recognition and utilization of his firearm invention by the military or any law enforcement agency. Plaintiff alleges that all the defendants he has sued are engaged in a massive conspiracy to deprive the nation of his invention, and that these defendants have used virtually everything at their disposal (from verbal threats to police pursuit planes) to harass and intimidate plaintiff and cover up their own misdeeds.

Plaintiff's basic grievance aside, the amended complaint in its present 291 page form is a gross and excessive abuse of process, so out of harmony with FRCP Rule 8 that a proper examination of it merits or defects is nearly impossible. However, after a laborious reading of the entire document, the Court has been able to note the following:

- (a) "Cause of Action" numbers 30 to 51 are virtually identical to numbers 1 through 22 (i.e., the former appear to be xerox copies of the latter, with only occasional minor word changes);
- (b) "Cause of Action" numbers 52 through 60 are completely repetitive, though not exact copies, of earlier causes of action;
- (c) constant allegations of conspiracy, and the incorporation by reference of every cause of action into every other make it virtually impossible for each individual defendant to determine what specific unlawful acts are alleged to have been committed by him so as to properly defend against plaintiff's action; and

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(d) the ombination of numerous le 1 theories in a single cause of action (and often pleaded in a vague, conclusory manner) is confusing and puts an unfair burden upon the defendants to determine which factual allegation applies to which theory.

Given this state of the pleadings, plaintiff has clearly failed to comply with the requirements of FRCP Rule 8(a) and 8(e) with regard to his amended complaint. The Court will therefore order the amended complaint dismissed. Agnew v. Moody, 330 F.2d 868 (9th Cir. 1964), cert. denied, 379 U.S. 867; Corcoran v. Yorty, 347 F.2d 222 (9th Cir. 1965). The Court will, however, grant plaintiff leave to file a Second Amended Complaint within 60 days, and to serve the new complaint upon all named defendants.

To insure, as much as possible, plaintiff's compliance with the Federal Rules of Civil Procedure, the Court will take the following actions in the remainder of this Memorandum and Order:

- A. Eliminate certain portions of the instant amended complaint with prejudice, those portions containing defects not curable by amendment. Plaintiff's suit is over with regard to such claims and parties dismissed with prejudice, and any new complaint plaintiff files in this action should refrain from their mention; and
- B. Provide plaintiff with a set of legal ground rules to follow in the drafting of his new complaint. Failure to observe these rules may subject plaintiff to Orders striking portions of the new complaint or dismissing the entire action with prejudice.

IT IS THEREFORE ORDERED that the motions of all defendants to dismiss the amended compalint, filed May 12, 1978, for failure to comply with FRCP Rule 8 be, and the same hereby are, granted.

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IT IS FURTHER ORDERED that plaintiff shall have
60 days to file and serve (through the Marshal's office) a
"Second Amended Complaint" that conforms to Rule 8 and to the
ground rules laid out in this Memorandum and Order.

IT IS FURTHER ORDERED that plaintiff's FRCP Rule 5 motion, presently set for October 10, 1978, be <u>vacated</u> as premature.

## A. Dismissals with prejudice:

- not, nor could it be amended to, state a class-based invidiously discriminatory animus. Such an allegation is required to state a cause of action under 42 U.S.C. §1985. Griffin v. Brecken-ridge, 91 S.Ct. 1790 (1971). Therefore, any claim based upon §1985 is hereby dismissed with prejudice, pursuant to FRCP 12(b)(6). Because of a failure to establish any §1985 right, the interrelated, dependent §1986 claim is also hereby dismissed with prejudice. Dowsey v. Wilkins, 467 F.2d 1022, 1026 (5th Cir. 1972).
- 2. Plaintiff's instant amended complaint does not, nor could it be amended to, state a racial basis behind any alleged discrimination. Such an allegation is required to state a cause of action under 42 U.S.C. §1981. Arnold v. Tiffany, 359 F.Supp. 1034 (C.D. Cal. 1973), aff'd., 487 F.2d 216, cert. denied, 415 U.S. 984; Gradillas v. Hughes Aircraft Co., 407 F.Supp. 865, 867 (D.Ariz. 1975). Therefore, any claim based upon §1981 is hereby dismissed with prejudice, pursuant to FRCP 12(b)(6).
- 3. The applicable statute of limitations to federal civil rights actions is the three year period of California Code of Civil Procedure §338(1) ("action upon a liability created by statute"). Smith v. Cremins, 308 F.2d 187 (9th Cir. 1962). The only act which defendant Western Union is accused of participating in occurred on April 28, 1973

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(see, amended complaint, pp.76, 183, 226). Since the original complaint was filed in this Court on August 20, 1976, after the running of the applicable 3 year statute of limitations, the action must be, and hereby is, dismissed with prejudice as to defendant Western Union.

4. In light of this applicable 3 year statute of limitations, all civil rights allegations in this action occurring prior to August 20, 1973 are hereby dismissed with prejudice.

IT IS SO ORDERED.

# B. Legal ground rules:

- 1. Any new complaint must satisfy FRCP Rules 8(a) and 8(e). Plaintiff is also directed to take note of the pleading-drafting language of Rules 12(e) and 12(f).
- 2. Any new complaint must state its claims with factual specificity and not in a conclusory fashion. See, Finley v. Rittenhouse, 415 F.2d 1186 (9th Cir. 1969).
- 3. Any allegations of conspiracy must include the overt act done in furtherance thereof. Sykes v. State of California, 497 F.2d 197, 200 (9th Cir. 1974).
- 4. Any new complaint must omit all "John Doe" defendants. Tolefree v. Ritz, 382 F.2d 566, 567 (9th Cir. 1967).
- 5. Plaintiff should supply affidavits under penalty of perjury, if he can, showing specific contacts of non-resident defendants in the State of California so as to support personal jurisdiction over these defendants. (Such defendants include Alexander Haig, William Ruckelshaus, Leon Jaworski, L. Patrick Gray, and Clarence Kelley; also Colt Industries Inc., National Sheriffs' Association, and I.A.C.P.) This Court is not bound by plaintiff's pleadings in determining personal jurisdiction; rather, the party asserting jurisdiction has the burden of establishing it if his allegations are

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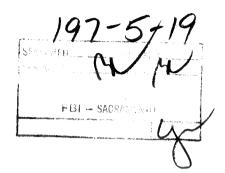
challenged in an appropriate manner (as they are here by affidavits of certain defendants). Taylor v. Portland Paramount Corporation, 383 F.2d 634, 639 (9th Cir. 1967); Uston v. Grand Resorts, Inc., 564 F.2d 1217 (9th Cir. 1977). In regard to the above listed non-resident individual federal defendants plaintiff should demonstrate, if he can, forum-related acts personally committed by each individual. See, Kipperman v. McCone, 422 F.Supp. 860, 873 (N.D. Cal. 1976). Failure to establish personal jurisdiction over any non-resident defendant will subject plaintiff's action to a dismissal with prejudice with respect to such defendant.

6. Any <u>proper</u> civil motions related to this action must be noticed pursuant to Local Rule 113(b) and (e), and not merely requested in the body of a points and authorities memorandum.

IT IS SO ORDERED.

DATED: August 2%, 1978.

UNITED STATES DISTRICT JUDGE



#### ORIGINAL FILED

HERMAN SILLAS United States Attorney

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AUG 21 1978

JAMES S. JOINER Assistant U. S. Attorney

CLERK, U. S. DIST. COURT Eastern District of California

2058 Federal Building 650 Capitol Mall Sacramento, California 95814 Telephone (916) 440-2425

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Attorneys for the Defendant United States of America

5/8/94 SSA9803KDD

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

GEORGE A. BRONSON,

Plaintiff,

v.

CIVIL NO. S-76-447-PCW

THE UNITED STATES OF AMERICA, et al.,

Defendants.

UNITED STATES OF AMERICA'S REPLY TO
BRIEF IN SUPPORT OF MOTION TO DISMISS

I

Plaintiff Cannot Meet Its Burden of Proving Personal Jurisdiction.

Plaintiff has made brief reference to 28 U.S.C. § 1391(e) in support of his contention that the Court has personal jurisdiction over all defendants in this matter. While it remains unclear whether plaintiff is individually suing defendants Haig, Ruckelshaus, Jaworski, Gray and Kelley, each of these defendants dispute the applicability of § 1391(e).

In the recent case of <u>Driver v. Helms</u>, <u>F.2d</u>, (1st Cir. 1978), No. 77-1482, plaintiff sought to apply § 1391(e) to former government officials. The court

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FORM 03D-94 8-8-74 Formerly L4A-94

U.S.GPO: 1975--575-988

stated very clearly:

We do not, however, find any indication in the statute itself or in the legislative history that former officials were meant to be included. We are not alone in this conclusion. See Kipperman v. McCone, 422 F. Supp. 860, 876 (N.D. Cal. 1976); Wu v. Keeney, 384 F. Supp. 1161, 1168 (D.C. Dist. 1974). (Emphasis added) Id., at 4.

As discussed in the United States' opening brief, plaintiff has the burden of establishing jurisdiction. In the present matter, that simply cannot be done.

Messrs. Ruckelshaus, Gray, Jaworski and Kelley are former government officials. General Haig was not yet Commander of NATO at the time of the allegedly improper conduct. Thus, the Amended Complaint should be dismissed with respect to defendants Haig, Ruckelshaus, Jaworski, Kelley, and Gray.

DATED: August 21, 1978

HERMAN SILLAS United States Attorney

JAMES S. JOINER
Assistant U.S. Attorney

Attorneys for the Defendant United States of America

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8-8-74
Formerly LAA-94
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# CERTIFICATE OF SERVICE BY MAIL

GEORGE A. BRONSON,

Plaintiff,

v.

UNITED STATES OF AMERICA, et al.,

Defendants.

Civil No. S-76-447-PCW

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the <u>Eastern</u> District of <u>California</u> and is a person of such age and discretion as to be competent to serve papers.

That on August 21, 1978 she served a copy of the attached

UNITED STATES OF AMERICA'S REPLY TO BRIEF IN SUPPORT OF MOTION TO DISMISS

by placing said copy in a postpaid envelope addressed to the person(s) hereinafter named, at the place(s) and address(es) stated below, which is/are the last known address(es), and by depositing said envelope and contents in the United States Mail at Sacramento, California.

Addressee(s):
George A. Bronson
P.O. Box 588
Sacamento, CA 95804

Darryl Doke, Esq.
Deputy Attorney General
State of California
555 Capitol Mall, Suite 350
Sacramento, CA 95814

Porter, Scott, Weiberg & Delehant 300 University Ave., Suite 207 Sacramento, CA

Gibson, Dunn & Crutcher 515 South Flower Street Los Angeles, CA 90071

Ramsey, Scott & Morrison 800 Ninth Street Sacramento, CA 95814

Diepenbrock, Wulff, Plant & Hannegan 455 Capitol Mall, Suite 800 Sacramento, CA 95814

John H. Larson, Co. Counsel County of Los Angeles 648 Hall of Administration 500 West Temple Street Los Angeles, CA 90012

Bolling, Pothoven, Walter & Gawthrop 555 University Avenue Sacramento, CA 95825

Vantassell, Fornasero & Vantassell 917 G Street Sacramento, CA 95814

Burt Pines, City Attorney 1700 City Hall East 200 North Main Street Los Angeles, CA 90012

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DIANA BERRY

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HERMAN SILLAS United States Attorney

JUL 3 1 1978

JAMES S. JOINER Assistant U. S. Attorney

CLERK, U. S. DIST. COURT Eastern District of California

2058 Federal Building 650 Capitol Mall Sacramento, California 95814 Telephone (916) 440-2425

Attorneys for the Defendant United States of America

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

GEORGE A. BRONSON, Plaintiff,

5/8/96 BY SSAGEO3RUD 18

WIRETO IS UNCLOSSIFIED

ALL ANYONAS TON TOFTA IMP

v.

CIVIL NO. S-76-447-PCW

THE UNITED STATES OF AMERICA, et al.,

NOTICE OF MOTION AND MOTION TO DISMISS

Defendants.

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#### NOTICE OF MOTION

TO: PLAINTIFF GEORGE BRONSON:

Notice is hereby given that on August 28, 1978, at Courtroom Number 2 for the Eastern District of California, 650 Capitol Mall, Sacramento, California defendants Alexander Haig, William Ruckelshaus, Leon Jaworski, L. Patrick Gray, Clarence Kelley, Dwayne Keyes, Donald Heller, James Chastain, Steven Greer, Walter Smith and Clarence Snelson will move to dismiss the Amended Complaint filed in the above-captioned case, or such other relief as the Court deems proper.

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Ronald Reagan-3065

# MOTION TO DISMISS

Defendants Alexander Haig, William Ruckelshaus, Leon Jaworski, L. Patrick Gray, Clarence Kelley, Dwayne Keyes, Donald Heller, James Chastain, Steven Greer, Walter Smith, and Clarence Snelson hereby move the United States District Court to dismiss plaintiff's Amended Complaint in the above-captioned case, or such other relief as the Court deems proper on the grounds that said Amended Complaint violates Rules 8(a), 8(c) and 10(b) of the Federal Rules of Civil Procedure, venue does not rest in the Eastern District of California and, the Court does not have  $\underline{\text{in}}$ personam jurisdiction over Messrs. Haig, Jaworski, Gray, Ruckelshaus and Kelly. This Motion is based upon the Memorand um of Points and Authorities, and papers attached hereto, and such other reasons as the Court shall deem proper. ////// /////// ////// /////// ///////

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Ronald Reagan-3066

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FORM 08D-94 8-8-74 Formerly LAA-94

): 1975-575-986

MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO DISMISS

### INTRODUCTION

Plaintiff has served an Amended Complaint upon several defendants, among whom are Alexander Haig, William Ruckelshaus, Clarence Kelley, L. Patrick Gray, Leon Jaworski, Dwayne Keyes, Donald Heller, James Chastain, Clarence Snelson, Walter Smith, and Steven Greer. It is, however, unclear from the Amended Complaint whether each of these defendants have been served in their individual or official capacity. Consequently, each of these defendants has brought the present motion by special appearance, and without waiving the right to assert pleading defects based upon lack of personal jurisdiction, improper venue, insufficiency of process or insufficiency of service of process.

THE AMENDED COMPLAINT DOES NOT COMPLY WITH PLEADING REQUIREMENTS SET FORTH IN THE FEDERAL RULES OF CIVIL PROCEDURE

Α

THE AMENDED COMPLAINT DOES NOT COMPLY WITH F.R.CIV.P. 8

The Federal Rules of Civil Procedure require that

A pleading which sets forth a claim for relief . . . shall contain a short and plain statement of the claim showing that the pleader is entitled to relief . . . F.R.Civ.P. 8(a).

In addition, the Federal Rules require that

Each averment of a pleading shall be simple, concise, and direct. F.R.Civ.P. 8(e)(1).

These rules have been applied by the Ninth Circuit on several occasions. In Agnew v. Moody, (9th Cir. 1964) 330 F.2d 868, the court was presented with a fifty-five page civil rights Complaint, excluding prayer and exhibits.

District Court dismissed the Complaint on the ground that it did not contain "... a short and plain statement of the claim". <u>Id</u>., at 870. The Ninth Circuit upheld the lower court's decision with the statement that

. . . the district court was entirely justified in holding that the complaint did not comply with Rule 8(a), and in ordering appellant to replead. Id., at 870.

A similar issue was addressed by the Ninth Circuit in Corcoran v. Yorty, (9th Cir. 1965) 347 F.2d 222. In that case, another civil rights action, the court cited Rule 8(a) and stated

We recently upheld the dismissal of a complaint on this ground where the complaint was no more confusing than that in the present case. (citing Agnew v. Moody) What we stated in that case is appropriate in the present setting and we adhere to the position taken there. Id., at 223.

In Carrigan v. California State Legislature, (9th Cir. 1959), 263 F.2d 560, the District Court was presented with a one hundred eighty-eight page Complaint attacking provisions of the California Workmen's Compensation system.

Again, the Ninth Circuit upheld the dismissal, citing Rule 8(a) and Rule 8(e). See also Lowery v. Hauk, (C.D. Ca. 1976) 422 F.Supp. 490; Bouski v. Stewart, (S.D.N.Y. 1974) 381 F. Supp. 529; and Liezzi v. Berzak, (S.D.N.Y. 1972) 57 F.R.D. 149.

The Amended Complaint presently before the Court consists of two hundred ninety-one pages. 1/ Webster's New Collegiate Dictionary defines the term short as "having little length". A Complaint of two hundred ninety-one pages has substantial length and should be dismissed for that reason alone. Such a dismissal is supported by Agnew, Corcoran, and Carrigan (supra).

The Amended Complaint also appears to include within each cause of action several legal theories. Virtually

Ronald Reagan-3068

FORM OBD-94 8-8-74 Formerly LAA-94

U.S.GPO: 1975-575-98

<sup>1/</sup> Although the last page is not numbered 291, there are several instances of sub-pages (e.g., 7, 7a, 7b, etc).

every cause of action expressly refers to the Civil Rights Act (28 U.S.C. § 1343, 42 U.S.C. § 1981 et seq.), the Federal Tort Claims Act (28 U.S.C. §§ 1346(b), 2671 et seq.), intentional torts, and violations of the First, Fourth, Fifth, Sixth, Seventh, and Fourteenth Amendments to the Constitution of the United States. These causes of actions are at various times coupled with allegations of violations of the Constitution of the State of California, the Sherman Antitrust Act, the Clayton Act, the Federal Election Campaign Law and Act and the California Public Utilities Act.2/

Webster's New Collegiate Dictionary has defined the term "plain" as "free of extraneous matter" and as "not complicated". Clearly, any pleading that combines several legal theories in a single cause of action is complicated and contains extraneous matter.3/

The pleading involved here places the burden upon the defendants of determining which factual allegation applies to which legal theory. The complex and confusing combination of numerous legal theories has rendered a proper analysis by the defendants impossible. Therefore, the Amended Complaint should be dismissed for failure to present a "plain" pleading.

The Amended Complaint is also repetitive. The matters addressed in the First Cause of Action through the Twenty-second Cause of Action are repeated virtually

U.S.GPO: 1975-575-986

In addition, virtually every cause of action incorporates by reference "... all allegations set forth in all causes of action herein, hereinbefore and hereinafter complained of ... " (see for example Third Cause of Action, et seq.).

An example of the type of extraneous matter included within the Amended Complaint may be seen at page 273c. When seventy-five causes of action combine numerous legal theories within each cause of action, the matter is further complicated.

FORM 09D-94
8-8-74
Formerly LAA-94
U.S.GPO: 1975--575-986

verbatim in the Thirtieth Causes of Action through the Fifty-Second Cause of Action. In a few of these causes of action the grammar is slightly altered, however, there are no substantive alterations. Such repetition is contrary to the requirement in F.R.Civ.P. 8(e) of a "concise" pleading.

In addition to the matters raised above, the

Amended Complaint is interwoven with allegations of conspiracy,

John Doe allegations and incorporations by reference. As

a result, it is impossible to determine which defendants

are intended to be included in the following Causes of

Action.

- defendants or refer to ". . . defendants and each of them . . . ".4/ First, Second, Fifth, Sixth, Eighth, Ninth, Twelfth, Thirteenth, Fourteenth, Fifteenth, Seventeenth, Eighteenth, Nineteenth, Twentjeth, Twenty-first, Twenty-second, Twenty-third, Twenty-fifth, Twenty-seventh, Twenty-eighth, Twenty-ninth, Thirtieth, Thirty-first, Thirty-fourth, Thirty-fifth, Thirty-seventh, Thirty-eighth, Forty-first, Forty-second, Forty-third, Forty-fourth, Forty-seventh, Forty-eighth, Forty-ninth, Fiftieth, Fifty-first, Fifty-ninth, Sixty-sixth, Seventh-third, Seventy-fourth and Seventh-fifth.
- 2) Causes of actions that allege acts by John Does: 5/Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, Twelfth,

The defendants have not included conspiracy allegations that cite acts of ". . . said defendants . . . ." Rather the defendants only include allegations directed to ". . . defendants . . . " or ". . . defendants and each of them . . . ."

<sup>&</sup>quot;Doe" allegations are an improper means of naming defendants. Wilitsie v. California Department of Corrections, (9th Cir. 1968) 406 F.2d 515; Tolefree v. Ritz (9th Cir. 1967) 382 F.2d 566.

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FORM 08D-54 8-8-74 Formerly LAA-94

☆ U.S.GPO: 1975-575-986

Thirteenth, Fourteenth, Fifteenth, Sixteenth, Seventeenth, Eighteenth, Nineteenth, Twentieth, Twenty-first, Twenty-second, Twenty-third, Twenty-fourth, Twenty-fifth, Twenty-seventh, Twenty-ninth, Thirty-fourth, Thirty-fifth, Thirty-sixth, Thirty-seventh, Thirty-eighth, Thirty-ninth, Forty-first, Forty-second, Forty-third, Forty-fourth, Forty-fifth, Forty-sixth, Forty-seventh, Forty-eighth, Forty-ninth, Fiftieth, Fifty-first, Sixty-third, Sixty-fifth, Sixty-sixth, Sixty-seventh, Sixty-ninth, Seventy-second, Seventy-fourth and Seventy-fifth.

With the John Doe allegations, conspiratorial allegations, references to "defendants" or "defendants and each of them" and allegations that incorporate by reference "... all allegations set forth in all causes of actions herein, hereinbefore and hereinafter complained of ..." the Amended Complaint is neither "short" nor "plain" as required by F.R.Civ.P. § 8(a). Moreover, the Amended Complaint is not simple, concise, and direct, as required by F.R.Civ.P. § 8(e). Therefore, it is respectfully requested that the Court dismiss plaintiff's Amended Complaint for failure to comply with Rule 8 of the Federal Rules of Civil Procedure.

В

# THE AMENDED COMPLAINT DOES NOT COMPLY WITH F.R.CIV.P. 10(b)

In addition to F.R.Civ.P. 8, this Motion to Dismiss is premised upon F.R.Civ.P. 10(b). That rule states that

Each claim founded upon a separate transaction or occurrence . . . shall be stated in a separate count or defense whenever separation facilitates the clear presentation of the matters set forth. (Emphasis added)

Rule 10(b) was discussed in <u>Barnard v. Pennsylvania</u>

Range Boiler Company, (E.D. PA 1962) 32 F.R.D. 58. There,

plaintiff combined, within a single cause of action, claims

FORM 08D-94 8-8-74 Formerly LAA-94 moved to dismiss based upon rules 8 and 10 of the Federal Rules of Civil Procedure. In response to the rule 10(b) assertion, the court stated

based upon negligence and breach of warranty. Defendant

Plaintiff's Complaint does not conform to this rule. Even a cursory reading of the disputed averments in paragraphs 6 and 7 show a haphazard intermingling of negligence allegations with breach of warranty claims. This makes it extremely difficult if not impossible for each of these four defendants to answer this Complaint. Some may be only guilty of negligence and others may be only guilty of breach of warranty. This pleading is not within the spirit and intent of F.R.Civ.P. 10(b).

As discussed above the Amended Complaint includes numerous claims and numerous defendants within each cause of action. Defendants are thus left with the impossible burden of having to guess which claims apply to which defendants under which set of facts. For this reason, and those stated above, it is respectfully requested that plaintiff's Amended Complaint be dismissed.

ΙI

IT CANNOT BE DETERMINED WHETHER VENUE FOR THE ALLEGED ACTS RESTS IN THE EASTERN DISTRICT OF CALIFORNIA

In addition to the matters discussed above, defendants Haig, Ruckelshaus, Kelley, Gray and Jaworski move to dismiss the Amended Complaint on the ground that venue is improper in the Eastern District of California.

Since the Amended Complaint presents a civil action not based solely upon diversity jurisdiction, venue is governed by 28 U.S.C. § 1391(b).

A civil action wherein jurisdiction is not founded solely on diversity of citizenship may be brought only in the judicial district where all defendants reside, or in which the claim arose, except as otherwise provided by law.

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8-8-74 Formerly LAA-94

U.S.GPO. 1975-575-986

Plaintiff has not and cannot demonstrate that any of the acts alleged against these defendants occurred in California for the simple reason that all of these defendants were in Washington D.C. Therefore, venue is improper because it has not been brought in the district "... in which the claim arose ..." [28 U.S.C. § 1391(b)].

Moreover, plaintiff has not and cannot demonstrate that all defendants reside in the Eastern District of California, since each was served outside the State of California.

Thus, each of these defendants moves to dismiss the Amended Complaint for lack of proper venue.

#### III

CALIFORNIA LACKS IN PERSONAM JURISDICTION OVER DEFENDANTS HAIG, RUCKELSHAUS, KELLEY, GRAY AND JAWORSKI

Jurisdiction over the defendants may be asserted in the United States District Court for the Eastern District of California only if defendants Haig, Ruckelshaus, Kelley, Gray and Jaworski have sufficient "minimal contacts" with California to make the exercise of jurisdiction over the parties "reasonable" and consistent with the requirements of due process. International Shoe Co. v. Washington, (1945), 326 U.S. 310; Dracor Shipping Corporation v. Union Tank Car Company, (9th Cir. 1966), 361 F.2d 43; Kourkene v. American BBR, Inc., (9th Cir. 1963), 313 F.2d 769; L. D. Reeder Contractors of Arizona v. Higgins Industries, Inc., (9th Cir. 1959), 265 F.2d 768; Le Vecke v. Griesedieck Western Brewery Co., (9th Cir. 1956), 233 F.2d 772. burden of establishing sufficient contacts between the state and the defendants, sufficient to justify service of process and personal jurisdiction, is upon the plaintiff. Moreover, plaintiff's evidence must be in the form of

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probative facts. The allegations appearing in the Amended Complaint are not sufficient and the trial court is not bound by the pleadings. Taylor v. Portland Paramount Corporation, (9th Cir. 1967), 383 F.2d 634; Tiffany Records, Inc. v. M. B. Krupp Distributors, Inc., (1969), 276 Cal.App.2d 610, 81 Cal.Rptr. 320;

> In a motion of this type, plaintiffs have the burden of establishing the presence of the defendant they undertake to sue. (citations omitted)

[W] here a defendant properly moves to quash out of state service of process for lack of jurisdiction, the burden of proof is upon the plaintiff to establish the facts of jurisdiction by a preponderance of the evidence . . . (citations omitted). Kesler v. Schetky Equipment Corp., (N.D. Cal. 1961), 200 F. Supp. 678, 779.

PLAINTIFF MUST ESTABLISH THAT EACH PARTY HAS ENGAGED IN PUR-POSEFUL ACTIVITY WITHIN THE STATE OF CALIFORNIA

California standards for the imposition of jurisdiction over nonresident individuals are identical with federal constitutional standards. California Code of Civil Procedure, Section 410.10 provides that:

> A court of this state may exercise jurisdiction on any basis not inconsistent with the Constitution of this state or of the United States.

Federal constitutional law regarding in personam jurisdiction was developed in a series of United States Supreme Court cases. In International Shoe Co. v. Washington (1945), 326 U.S. 310, the Supreme Court developed what has come to be known as the "minimum contacts" test:

> Whether due process is satisfied must depend rather upon the quality and nature of the activity in relation to the fair and orderly administration of the laws which it was the purpose of the due process clause to insure. That clause does

8-8-74

not contemplate that a state may make binding a judgment in personam against an individual or corporate defendant with which the state has no contacts, ties, or relations. Id., at 319.

In International Shoe, the Court found that the defendant had regularly, systematically and continuously solicited orders in the forum state through salesmen residing within the state, that these activities were "neither irregular nor casual", that these efforts resulted in a substantial volume of interstate business, and that, in effect, the defendant had sought and received the benefits and protections of the forum state. In addition, the obligation sued upon arose out of these very activities. these factors are entirely lacking with respect to defendnats Haig, Ruckelshaus, Kelley, Gray and Jaworski.

In <u>Hanson v. Denckla</u>, (1958), 357 U.S. 235, the Supreme Court, after noting the trend of expanding personal jurisdiction over nonresidents, stated:

> But it is a mistake to assume that this trend heralds the eventual demise of all restrictions on the personal jurisdiction of state courts. See Vanderbilt v. Vanderbilt, 354 U.S. 416, 418, 1 L.Ed.2d 1456, 1459, 77 S.Ct. 1369. Those restrictions are more than a guarantee of immunity from inconvenient or distant litigation. are a consequence of territorial limitations on the power of the respective States. However minimal the burden of defending in a foreign tribunal, a defendant may not be called upon to do so unless he has had the 'minimal contacts' with that State that are a prerequisite to its exercise of power over him. See International Shoe Co. v. Washington, 326 U.S. 310, 319, 90 L.Ed. 95, 103, 66 S.Ct. 154, 161 ALR 1057.

The unilateral activity of those who claim some relationship with a nonresident defendant cannot satisfy the requirement of contact with the forum State. The application of that rule will vary with the quality and nature of the defendant's activity,

-11-

FRRM 08D-94 2-8-74 Formerly LAA-94

4 U.S.GPO: 1975-575-998

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but it is essential in each case that there be some act by which the defendant purposefully avails itself of the privilege of conducting activities within the forum State, thus invoking the benefits and protections of its laws. (Emphasis added) Hanson v. Denckla, 357 U.S. 235, 251-253

R

DEFENDANTS' ACTIVITY IN CALIFORNIA DOES NOT JUSTIFY EXERCISE OF IN PERSONAM JURISDICTION

The issue presently before this Court is whether personal jurisdiction may be exercised over a nonresident federal government official. In <a href="Kipperman v. McCone">Kipperman v. McCone</a>, (N.D. Cal.) 422 F.Supp 860, the concepts announced in <a href="International Shoe">International Shoe</a> and CCP 410.10 were given application to the case at bar. There, nonresident federal officials were charged with illegally opening plaintiff's mail in New York. Plaintiff, who brought suit in San Francisco, contended that <a href="interconam">interconam</a> jurisdiction existed in California since a similar mail intercept program occurred in San Francisco. The court stated,

The Court also rejects the contention that the operation of the CIA's West Coast Mail Intercept in San Francisco for several two to three week periods during 1969, 1970 and 1971 supply it with jurisdiction over the nonresident defendants. Id. at 873

\* \* \*

Thus, in the final analysis, plaintiff cannot identify any act committed in this state by any of the nonresident defendants which is substantially related to the alleged interception of her mail to or from the Soviet Union in New York. Id., at 874.

In the present case, plaintiff simply cannot identify any acts of defendants Haig, Ruckelshaus, Gray, Kelley or Jaworski that are sufficient to justify in personam jurisdiction in California. As a result, the burden of proving sufficient contacts to justify jurisdiction has not and cannot be met.

FORM 08D-94 8-8-74 Formerly LAA-94

4 U.S.GPO: 1975--575-988

FORM 08D-94 8-8-74 Formerly LAA-94

U.S.GPO: 1975-575-986

A FEDERAL OFFICIAL CANNOT BE HELD PERSONALLY LIABLE UNDER A VICARIOUS LIABILITY THEORY

It remains unclear whether plaintiff has named various defendants in their official or individual capacities. To the extent that the Amended Complaint might be construed to seek personal liability of a federal official for the acts of employees of a governmental agency, it is defective.

In <u>Sportique Fashions</u>, Inc. v. Sullivan, (N.C. Cal. 1976) 421 F.Supp. 302 plaintiff sought personal recovery from several postal officials for late or non-delivery of advertising materials. Upon challenge by the defendants, the Court stated

No defendant herein may be held liable under a theory of vicarious liability for the acts of subordinates or other employees in the Postal Service. (Citations omitted) Id., at 306.

The issue of vicarious liability with respect to constitutional violations was treated in <u>Kite v. Kelley</u>, (10th Cir. 1976) 546 F.2d 334. The Court stated

The question then is whether a federal officer may be held monetarily liable for acts of his subordinates resulting in the deprivation of constitutional rights.

\* \* \*

On the assumption that (plaintiff) was deprived of some constitutional right, he nevertheless may not recover from any of the defendants on the doctrine or respondent superior. Id. at 337.

Thus, in the present case, plaintiff may not recover damages from an individual federal official for the acts of subordinates. To the extent that the Amended Complaint seeks such recovery, it is improper.

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Thus, for each of the foregoing reasons, it is respectfully requested that the Amended Complaint in this matter be dismissed.

DATE: July 31, 1978

HERMAN SILLAS United States Attorney

Assistant U. S. Attorney

-14-

FORM 08D-94 8-8-74 Formerly LAA-94

U.S.GPO: 1975-575-986

# CERTIFICATE OF SERVICE BY MAIL

GEORGE A. BRONSON, )		
Plaintiff,	•	•
v. THE UNITED STATES OF AMERICA, et al.,	CIVIL NO.	S-76-447-PCW
Defendants.)		

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the <u>Eastern</u> District of <u>California</u> and is a person of such age and discretion as to be competent to serve papers.

That on July 31, 1978 she served a copy of the attached NOTICE OF MOTION AND MOTION TO DISMISS

by placing said copy in a postpaid envelope addressed to the person(s) hereinafter named, at the place(s) and address(es) stated below, which is/are the last known address(es), and by depositing said envelope and contents in the United States Mail at Sacramento, California.

George A. Bronson P. O. Box 588 Sacramento, CA 95804

Darryl Doke, Esq. Deputy Attorney General State of California 555 Capitol Mall, Suite 350 Sacramento, CA 95814

Westley & Callahan 300 University Avenue Suite 207 Sacramento, CA 95825

Gibson, Dunn & Crutcher 515 South Flower Street Los Angeles, CA 90071

Ramsey, Scott & Morrison 800 Ninth Street Sacramento, CA 95814

Downey, Brand, Seymour & Rower 555 Capitol Mall, Suite 1050 Sacramento, CA 95814

Diepenbrock, Wulff, Plant & Hannegan 455 Capitol Mall, Suite 800 Sacramento, CA 95814

John H. Larson, Co. Counsel County of Los Angeles 648 Hall of Administration 500 West Temple Street Los Angeles, CA 90012

Bolling, Pothoven, Walter & Gawthrop 555 University Avenue Sacramento, CA 95825

Vantassell, Fornasero & Vantassell 917 G Street Sacramento, CA 95814

Burt Pines, City Attorney City of Los Angeles 1700 City Hall East 200 North Main Street Los Angeles, CA 90012

TO Plakemeyer

FEDERAL BUREAU OF INVESTIGATION FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 07-cv-3240

Total Deleted Page(s) = 5
Page 14 ~ Duplicate;
Page 15 ~ Duplicate;
Page 16 ~ Duplicate;
Page 17 ~ Duplicate;
Page 18 ~ Duplicate;

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# FILES AND RECORDS DESTRUCTION ORDER

W.C. 1 . Date 3-23-76
TO: SW 136 less
FROM: Su gement Boblet
RE: File No. 9-1046
I have reviewed this file, and under the criteria set forth in Part II, Section 3, of Manuer of Rules and Regulations, this file should be:
Destroyed
under the 120-day Rule 1-year Rule 5-year Rule -year Rule
Retained
Justification for Retention is as Fellows:
M. L
Case Agent's Initials
Supervisor's Initials

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ALL INFORMATION CONTAIND
HEREIN IS UNCLASSIFIED
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· WW 75 - 571-812

Ronald Reagan-2593

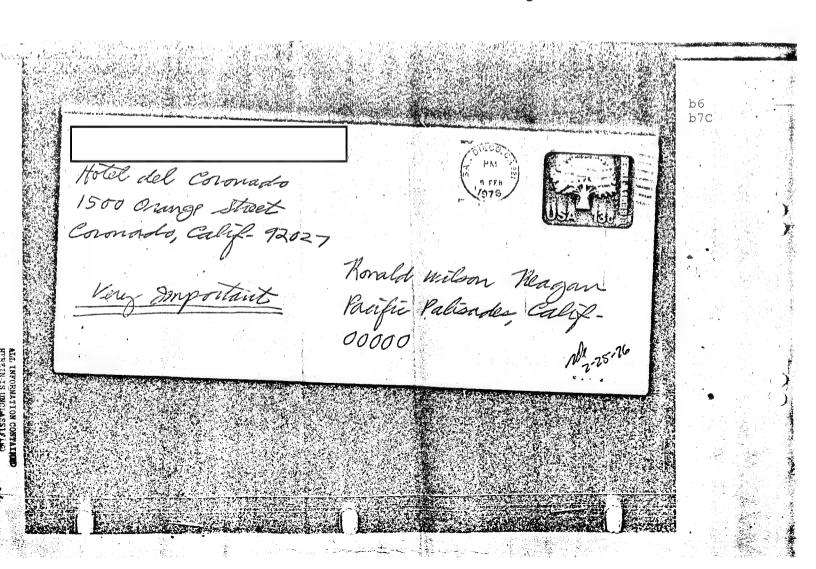
1500 crange avenue The Palisades Calif- 00000 George Christophers milk natering activities during WWZ in com with his daing Justiness to Drew you keep hands off welfare But hell not mow its til for tat unnaking you as possible president positive to sould Rbut your present wife Many Davis wa i Communist to the same extent as the Thywood 10 and the late Larry Park wells the demise of your Presidential an ALL INFORMATION CONTAIN

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Page Trivo-Ronald Milson Reagan, Feb. 9, 19 Is ste is all in the official records of the House mamerican activities Committee of which Richard milly mijora was attorney and who has been requested to give detailed and precise information to the chairman the ford neelection committee Gerald & Food has been direct adviced of this action you asked frest and at long last you me Bout to get it where you wanted most In The End Think, you traverted bastard skunk! Do you I word to the wise - Withdraw

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Ronald Reagan-2596



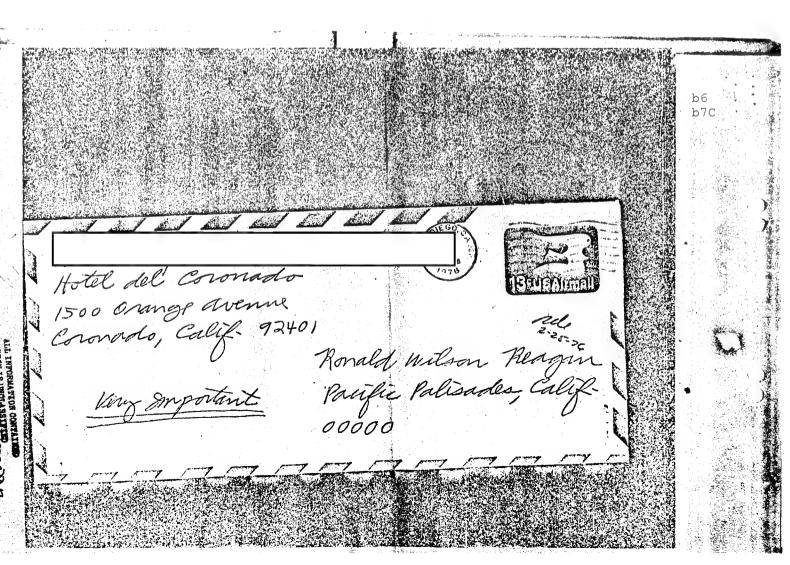
Hotel del Coronado 1500 many drenne Borald Wilson Heagan, ASB (a Son of a Bitch) alifornias Official asshole, Burghole, and

tamurid & Brown gr, Hubert Horatio Fumphrey, Edmund Minshie, George Hallace, and withan hoef

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ATRIEL

TO:

DIRECTOR. FBI

ATTN: PRI LABORATORY

PROM:

SAC, WPO (9-3897) (P)

DASSING.

和文化的。2004年(8)》。2004年

P. P.

00:35

Employed for the Bureau are three zerox copies each of threatening letters addressed to ROWALD VILSON REAGAN postporked 2/9 and 2/14/76, San Diego, California, 921.

Enclosed for San Delgo are two copies of letters.

THE PROPERTY SERVICE OF

Ambiguous remblings reflecting his animosity LOYET No. and Nos. William.

The Bureau has instructed that this matter must receive vigorous and continuous attention until fully resolved. A summary teletype, from the Office of Origin. must reach the Bereau by Close of Business (COB) 1/1/76, immediately followed by an LRM, from the Office of Origin, suitable for dissemination.

This material was received on 2/27/76 from SAC JAMES M. MASTROVITO, MISS NO., MDC. USSS has made a check of their name and visual files of previously submitted letters with positive results.

- Bureau (Encs. 3) . San Diego (Encs. (2)

JEB: ces

(7)

ALL INFORMATION CONTAINED HEREIN 15 UNCLASSIFIE

12 6 June 3/23/76 But 6 June 3/23/76

Ronald Reagan-2599

MPO 9-3897

USSS is conducting an investigation to further identify the unknown subject so that it can be determined if he is a danger to government dignitaries protected by them and their file number is CO2-72, 763.

Om 3/15/76, SA JOSEPH E. BATTLE advised the following individuals of the threat:

Lt. ROY BELL, U.S. Capitol Police, WDC.

Officer ROGER JOHNSON, Intelligence Division, MPD, WDC.

# REQUEST OF THE BUREAU

The Laboratory Division is requested to search this material through the Anonymous Letter File and conduct other appropriate examination. Lab furnish results expeditiously to Office of Origin.

## LEADS

# SAN DIEGO DIVISION

AT SAN DIEGO, CALIFORNIA. 1. Present to USA for prosecutive opinion.

- 2. Co-ordinate investigation with local authorities and local USSS office.
- 3. Submit summary teletype to Eureem by COB 4/1/76, immediately followed by LHM (or report if appropriate) suitable for dissemination. Insure WFO furnished copy so USSS HQ may be advised if USA authorises.

# WASHINGTON FIELD

AT VASHINGTON, D. C. Telephonically notify WESS of prosecutive opinion of USA upon receipt of same from Office of Origin.

## FBI

	, ,
	Date: (Typed 3/23/76)
Transmit	e following in PLAINTEXT  (Type in plaintext or code)
Via	TELETYPE NITEL
·	(Precedence)
	TO: DIRECTOR, FBI 1:10 A- PAW ALL INFORMATION CONTAINS HEREIN IS UNCLASSIFIED DATE 4 1994 BY 55A98 3 PD 35A98
	FROM: SAN DIEGO (9-1046)(P)
	JNSUB; AKA RONALD WILSON
	REAGAN-VICTIM, EXTORTION, OO: SD.
	RE WFO AIRTEL TO BUREAU, MARCH 15, 1976.
	FOR THE INFORMATION OF THE BUREAU AND WFO, ON MARCH 22, b6
	1976, SA RICHARD CRABTREE, U.S. SECRET SERVICE, SAN DIEGO,
	CALIFORNIA, ADVISED THAT HE WAS FAMILIAR WITH CAPTIONED MATTER
	AND HAD PREVIOUSLY CONDUCTED INVESTIGATION REGARDING IT. SA
	CRABTREE FURTHER ADVISED THAT U.S. SECRET SERVICE, SAN DIEGO, HAD
	CLOSED THEIR FILE ON THIS MATTER. SA CRABTREE ADVISED THAT DURIN
	THE COURSE OF USSS INVESTIGATION CHECKS WERE MADE OF THE SAN
	DIEGO POLICE DEPARTMENT AND THE SAN DIEGO SHERIFF'S DEPARTMENT
	RECORD FILES REGARDING THIS MATTER AS WELL AS A CHECK OF THE
	SAN DIEGO POLICE DEPARTMENT, INVESTIGATIVE SUPPORT UNIT, WITH
	NEGATIVE RESULTS. SA CRABTREE ADVISED THAT THE HOTEL DEL
	CORONADO, CORONADO, CALIFORNIA, HAD ADVISED THAT THEY HAVE NO

- San Diego JAB/mjz(1)

AND THAT THEY DID NOT HAVE REGISTERED

PRESENT EMPLOYEES OR PREVIOUS EMPLOYEES USING THE NAME

Sent 3-24-76 1:104 M Per 73

Ronald Reagan-2601

Special Agent in Charge

## F B I

Date:

	the following in(Type in plaintext or code)
	(Precedence)
-	
	PAGE TWO (SD 9-1046)
	OR WITHIN THE RECENT PAST REGISTERED ANYONE USING THE ABOVE
	NAME.
	ON MARCH 23, 1976, ARTHUR LE BLANC, CHIEF OF POLICE,
	CORONADO, CALIFORNIA, ADVISED THAT HE WAS NOT FAMILIAR WITH
	ANYONE USING THE NAME OF OR ANY NUISANCE LETTER
	WRITERS USING THAT NAME.
	ON MARCH 22, 1976, LETTERS FURNISHED SAN DIEGO IN REAIRTEL
	WERE SHOWN TO AUSA HOWARD A. ALLEN, CHIEF OF THE CRIMINAL COM-
	PLAINT UNIT, SAN DIEGO, CALIFORNIA, WHO ADVISED THAT IN HIS
	OPINION THE LETTERS WOULD NOT WARRANT PROSECUTION AS THREATENING
	UNDER TITLE 18, U.S. CODE, SECTION 876 - MAILING THREATENING
	COMMUNICATIONS.
	SAN DIEGO INDICES NEGATIVE.
	LHM TO FOLLOW.
	======END

In Reply, Please Refer to Director United States Secret Service File No. SD 9-1046 Department of the Treasury Washington, D. C. 20223 RE: UNSUB: aka RONALD WILSON REAGAN -Dear Sir: EXTORTION The information furnished herewith concerns an individual or organization believed to be covered by the agreement between the FBI and Secret Service concerning protective b6 responsibilities, and to fall within the category or categories checked. b7C 1. Threats or actions against persons protected by Secret Service. 2. Attempts or threats to redress grievances. 3. Threatening or abusive statement about U.S. or foreign official. 4. Participation in civil disturbances, anti-U. S. demonstrations or hostile incidents against foreign diplomatic establishments. 5. Illegal bombing, bomb-making or other terrorist activity. 6. Defector from U. S. or indicates desire to defect. 7. Potentially dangerous because of background, emotional instability or activity in groups engaged in activities inimical to U. S. is not available. enclosed Photograph has been furnished Very truly yours, Clarence M. Kelley Director ALL INFORMATION CONTAINS HEREIN IS UNCLASSIFIED 2 - Bureau 1 - Special Agent in Charge (Enclosure(s)) -1 U. S. Secret Service, San Diego, California - San Diego (9-1046) Enclosure(s) JAB/mjz

Ronald Reagan-2603

San Diego, California March 23, 1976

**9-1046** 

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

BY SSA9863 DATE 4/18/96

UNKNOWN SUBJECT: AS RONALD WILSON REAGAN - VICTIM: EXTORTION

The Washington Field Office (WFO) of the FM advised that on February 27, 1976, they had received two handwritten letters from Special Agent in Charge (SAC) James M. Mastrovito, United States Searet Service (USSS) Headquarters, Washington, D.C. Both letters were addressed to bonald Wilson Reagan, Pacific Palisades, California. Larox copies of both letters and envelopes are attached.

On March 15, 1976, Special Agent (SA) Joseph E. Battle, WFO, PBI, advised Lieutement Roy Bell, U.S. Capital Police, Washington, D.C., and Officer Roger Johnson, Intelligence Division, Metropolitan Police Department, Washington, D.C., of the attached letters.

On March 22, 1976, SA Richard Crabtree, USSS, San Diego, California, advised SA James A. Bobbitt, FBI, b7C San Diego, California, that he had previously conducted am investigation regarding the attached letters and that during the course of this investigation Crabtree had caused a check of the Sen Diego Police Department and San Diego County Sheriff's Department records charles regarding with negative results. Additionally, SA Crabtree had contacted the San Diego Police Department, Investigative Support Unit, regarding this matter with negative results. SA Crabtree advised that a check with the Hotel Del Coronado revealed that they had no present or former employees by the name of

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

JAB/mjz

(6) mg 3 m Sile stupped 1 5D 3130176 MAG 1 5D

Ronald Reagan-2604

b6

UNKNOWN SUBJECT	ALSO
KNOWN AS	
	RONALD
WILSON REAGAN -	VICTIM

b6 b7C

that time they had no guests currently registered at the hotel or former guests using that name. SA Crabtree advised that USSS, San Diego, had closed their case regarding this matter.

on March 22, 1976, the attached letters were exhibited to Assistant U.S. Attorney Howard A. Allen, Chief of the Csiminal Complaints Unit, Sam Diago, California. After reviewing the letters AUSA Allen advised that it was his opinion that the letters would not warrant prosecution as threatening letters under Title 18, U.S. Code, Section 876.

On March 23, 1976, Arthur La Blanc, Chief of Police, Coronado, California, advised that he was not familiar with anyone using the name nor is he familiar with any nuisance letter writers using that name.

Records of the San Diego Office of the FBI failed to reveal any identifiable reference to

AIRTEL

TO:

DIRECTOR, FEI

FROM

SAC, SAN DIEGO (9-1046)(C)

UNSUB: aka

INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

DATE4/18/96

RONALD WILSON REAGAN - VICTIM EXTORTION OO: SAN DIEGO

> h6 b7C

Re WFO airtel to Durany dated 3/15/76, and Sau Diego teletype to Bureau dated 3/24/76.

Enclosed for the Bureau are three copies of LHM.

Enclosed for WFO is one copy of same LHM for information purposes.

FD-376 is attached to one copy of LHM furnished Bureau for dissemination to U.S. Secret Service Headquarters.

One copy of this LHM being furnished to U.S. Secret Service locally.

In view of AUSA's opinion and that fact that all Comf. W.S Aurustu logical investigation has been conducted, San Diego Division is considering this matter closed.

2 - Bureau (Encs-3) 1 - WFO (9-3897)(Encs-1)(INFO)

) - San Diego

9-1046-6

of the



# FEDERAL BUREAU OF INVESTIGATION WASHINGTON, D. C. 20325

To: SAC, Washington Field Office (9-3897)

March 26, 1976

From: Director, Federal Bureau of Investigation

9-61287

FBI FILE NO.

LAB. NO.

D-760317117 PF

YOUR NO.

Re: UNSUB;

RONALD WILSON REAGAN - VICTIM

EXT

00: SD

b6 b7C

Reference Airtel dated 3/15/76

The material described below has been searched in the following file without effecting an

identification:

Anonymous Letter File

Copies have

been added to this file for future reference.

The submitted material is retained.

#### MATERIAL SUBMITTED:

- Qcl Photocopy of envelope postmarked "SAN DIEGO CA 921 PM 9 FEB 1976" bearing written address "Ronald Wilson Reagan Pacific Palisades, Calif. 00000"
- Qc2 Photocopies of accompanying two-page letter bearing writing beginning "You double-crossing....."
- Qc3 Photocopy of envelope postmarked "SAN DIEGO CA 921 PM 14 FEB 1976" bearing written address "Ronald Wilson Reagan Pacific Palisades, Calif. 00000"
- Qc4 Photocopy of accompanying letter bearing writing beginning "Ronald Wilson Reagan, ASB...."

2-SAC, San Diego

HEREIN IS UNCLASSIFIED
DATE 41894 BY SSA9803 2003

9-1046-7 SENSED 770 DESERVA-1 1976

SAN DEDG

8



# FEDERAL BUREAU OF INVESTIGATION WASHINGTON, D. C. 20535

To: SAC, Washington Field Office (9-3897)

March 26, 1976

From: Director, Federal Bureau of Investigation

9-61287

FBI FILE NO.

LAB. NO.

D-760317117 PF

Re: UNSUB;

YOUR NO.

RONALD WILSON REAGAN - VICTIM

EXT 00: SD

b6 b7C

Reference Airtel dated 3/15/76

The material described below has been searched in the following file without effecting an identification:

Anonymous Letter File

Copies have

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The submitted material is retained.

### MATERIAL SUBMITTED:

- Photocopy of envelope postmarked "SAN DIEGO CA 921 PM 9 Qc1 FEB 1976" bearing written address "Ronald Wilson Reagan Pacific Palisades, Calif. 00000"
- Photocopies of accompanying two-page letter bearing writing Qc2 beginning "You double-crossing....."
- Photocopy of envelope postmarked "SAN DIEGO CA 921 PM Qc3 14 FEB 1976" bearing written address "Ronald Wilson Reagan Pacific Palisades, Calif. 00000"
- Photocopy of accompanying letter bearing writing beginning Qc4 "Ronald Wilson Reagan, ASB....."

2-SAC, San Diego

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 4118 PL BY SSA9803.

Ronald Reagan-2613

SD 9-1046-8H

9-3897-8

FD-491 (Rev. 1-17-77) UNITED STATES GOVERNMENT Memorandum DATE: 1/-8-71 TO ☐ RUC 9-1046\* Ronald Wilson Rea File Destruction b6 b7C Enclosed are These items are forwarded your office since: All logical investigation completed in this Division You were OO at the time our case was RUC'd. Enclosures are described as follows: Lab Report

ALL THEORIGINATION CONTAINED HEREIM IS UNCLASSIFIED

9-1046-8B I DIEGO

NOTE: DO NOT BLOCK STAMP ORIGINAL ENCLOSURES.

# IDEOLOGICAL STRUGGLE

Excerpts from address by Mr. Ronald Reagan. Rotary District Conference, March 3, 1961

-Most of us are agreed that the ideological struggle with Russia is the number one problem in the world. In spite of this unanimity, there is confusion, a difference in thinking, that is terrifying in its threat to our freedom.

In all the talk of "summit destruction of our way of life. meetings," compromise, and concession, there emerges the mistaken idea - held by many in direct armed conflict to her tacgovernment and certainly by tics and strategy for fear she many others who mold opinion in would be defeated. But this isn' the press and un the airwavesthat we are at peace, albeit an Kremlin. . . . uneasy one, with Russia. They say we must conduct ourselves so as to preserve that peace and work towards some far-distant day when the Russian bear will become a lamb and world ten-

The truth of the matter is that we are at war. We are losing that war simply because we don't or won't realize that we we in it. It's a strange war, fought with unusual weapons and strategy, but nevertheless m war. In this struggle every move and every word of the Russians is a calculated maneuver aimed at further-

sions evaporate.

ing their campaign. Make un mistake about it this is a declared war. We cannot yell foul. They have told us in their writings and in their talks that Communism and Capitalism cannot exist in the world together. Between table poundings, Khrushchev has said, "We still pursue the teachings of Marx that Capitalism must be destroyed, and there is as much chance of us forsaking that cause there is that shrimps will learn to whistle." On December 6, 1960, the 20,000 word manifes-to issued by the international Communist party meeting in Moscow reaffirmed their dedication to this conflict and the ultimate

This is not a shooting war because we have stayed militarily strong. Russia does not dare add too frustrating to the man in th

CHRISTIAN PROGRESS JUNE, 1961 SAN DIEGO, CALIFORNIA DR. WAYNE A. NEAL, EXECUTIVE SECRETARY

SERIALIZED S. FILED ... FILED ... FILED ... JUN 8 1961 - SAN DIEGO

Ronald Reagan-3335

FEDERAL BUREAU OF INVESTIGATION FOI/PA DELETED PAGE INFORMATION SHEET Civil Action# 07-cv-3240

Total Deleted Page(s) = 4

Page 4 ~ Duplicate; Page 5 ~ Duplicate; Page 6 ~ Duplicate; Page 8 ~ Duplicate;

X Deleted Page(s) XX No Duplication Fee XX For this Page X

NRØ37 LA PLAIN

SENT 144 AM JANUARY 7, 1974 PM NITEL 1-6-75 SGT

TO DIRECTOR

NEW YORK

PHOENIX

SACRAMENTO

SAN DIEGO

SAN FRANCISCO

ST. LOUIS

FROM LOS ANGELES (161-2715) (P)

RONALD WILSON REAGAN, SPECIAL INQUIRY, BUDED: CLOSE OF BUSINESS JANUARY 8, 1975, WITHOUT FAIL.

BUREAU HAS BEEN REQUESTED TO CONDUCT EXTREMELY EXPEDITE INVESTIGATION OF REAGAN WHO IS BEING CONSIDERED FOR PRESIDENTIAL APPOINTMENT, POSITION NOT INDICATED. PRESS REPORTS INDICATE HE HAS BEEN APPOINTED MEMBER OF COMMISSION TO INVESTIGATE CENTRAL INTELLIGENCE AGENCY (CIA).

REAGAN, BORN FEBRUARY 6, 1911, TAMPICO, ILLINOIS, AND HOLDER OF SOCIAL SECURITY NUMBER 480-07-7456, HAS SERVED TWO TERMS AS GOVERNOR OF CALIFORNIA. HE RESIDES AT 1669 SAN ONOFRE, PACIFIC PALISADES, CALIFORNIA.

THE FOLLOWING ARE HIS IMMEDIATE RELATIVES:

Ronald Reagan-2731

Willey Center of Ranches

ALL INFORMATION CONTAINED

5A9803RDB/5AC

# F B I

			Date:	1/8/75		i	
Transmit	the following in _		PLAINTEXT	1		-	
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	TO:	DIRECTOR,	FBI MKA			18e ro 190	23'
	FROM:	SAN DIEGO	(161-705) (	RUC)	7		
	RONALD REAC	GAN, SPECIAL	INQUIRY. E	BUDED: COE	3 JANUARY 8	3,	
	1975.						<u> </u> 
	RE SAC	CRAMENTO NIT	EL TO THE BU	REAU, JANU	JARY 6, 197	75,	
	AND LOS ANO	GELES NITEL	TO THE BUREA	u, JANUARY	7, 1975.		
	THE FO	OLLOWING INV	ESTIGATION W	AS CONDUCT	ED BY THE	SAN	
	DIEGO DIVIS	SION ON JANU	ARY 7 AND 8,	1975:	ALL INFORMATION	I CONTAIN®D	
	ASSOCI	CATES.			HEREIN IS UNCLA DATE 3-21-96	SSIFIED BY 35A9803L	DATA
	GORDON	N LUCE, PRES	IDENT AND CH	IEF EXECUT	TIVE, SAN I	03,145) DIEGO	
	FEDERAL SAV	VINGS AND LO	AN ASSOCIATI	ON, 600 "E	B" STREET,		
	SAN DIEGO,	ADVISED HE	HAS BEEN CLO	SELY ASSOC	CIATED WITH	I	
	APPOINTEE I	OURING PAST	NINE YEARS I	N WORKING	ON VARIOUS	3	
	COMMITTEES	BY APPOINTM	ENT OF GOVEF	NOR REAGAN	AND ALSO		
	THROUGH SEE	RVING AS SAN	DIEGO COUNT	Y CHAIRMAN	I AND CALIF	FORNIA	
	STATE CHAIR	RMAN OF REPU	BLICAN PARTY	. LUCE FA	VORABLY		
	RECOMMENDE	O APPOINTEE	TO ANY POSIT	ION OF TRU	JST AND		
	RESPONSIBII	LITY BASED O	N IMPECCABLE	PERSONAL	HABITS,		•
	7(2, 705)			16	61-705	_3	
	(161-705)			Searched. Serialized		Indexed.	******
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Approved: \_

Special Agent in Charge

Ronald Reagan-2735
Sent 1/8/75 16 47 M Per \_\_\_\_

GPO i 1970 O - 402-735

Approved: \_

# FB1

	(Type in plaintext or code)
·	(Priority)
PAGE THREE (SD	
APPOINTEE ALWA	YS EXEMPLARY IN EVERY RESPECT, DEDICATED
TO SERVING HIS	COUNTRY AND OTHERS WITH GREAT COMPETENCY.
APPOINTEE HAS	CLOSE PERSONAL RELATIONSHIP WITH FAMILY,
PRACTICES HIGH	MORAL STANDARDS AND USES INTOXICANTS ONLY
ON VERY LIMITE	D SOCIAL BASIS. HIGHLY RECOMMENDED.
ROBERT H.	ADAMS AND WIFE, ELIZABETH ADAMS,
	VALLEY CENTER, CALIFORNIA, ADVISED THEY
ARE PERSONALLY	ACQUAINTED WITH APPOINTEE AND FAMILY FOR
PERIOD OF FIFT	EEN YEARS. APPOINTEE DESCRIBED AS OUT-
STANDING MEMBE	R OF HIS COMMUNITY AND GREAT ASSET TO ANY
GOVERNMENTAL A	GENCY DUE TO INTEREST IN GOVERNMENT AND
ABILITY TO SER	VE. APPOINTEE HIGHLY RECOMMENDED,
BEING OF HIGH	CHARACTER, MODERATE IN PERSONAL HABITS
AND LOYAL UNIT	ED STATES CITIZEN.
RELATIVES	•
RESIDENCE	OF APPOINTEE'S BROTHER, J. NEIL REAGAN,
3941 VIA VALLE	VERDE, WHISPERING PALMS GREEN, RANCHO
SANTA FE. CALT	FORNIA, VERIFIED AND SATISFACTORY. HIGHLY

Sent \_

GPO: 1970 O - 402-735

Special Agent in Charge

# F B I

	Date:
Cransmit	the following in(Type in plaintext or code)
Via	(Priority)
	PAGE FOUR (SD 161-705)  RECOMMENDED BY NEIGHBORS. NO ARREST RECORD FOR NEIL  REAGAN LOCATED AT POLICE DEPARTMENTS AT SAN DIEGO, CARLSBAD,  OCEANSIDE, OR SHERIFF'S OFFICE AT SAN DIEGO, WHICH AGENCIES  HAVE JURISDICTION IN THE VICINITY OF RANCHO SANTA FE.  ===================================
	SAN DIEGO COPY ONLY:  INVESTIGATION AT SAN DIEGO AND CHULA VISTA CONDUCTED  BY SA C. JORDAN NAYLOR AND AT VALLEY CENTER, CARLSBAD,  OCEANSIDE AND RANCHO SANTA FE BY SA RICHARD A. MONTEE.
<u> </u>	Ronald Reagan-2738
	proved: M Per

GPO: 1970 O - 402-735

Special Agent in Charge

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DELETED PAGE INFORMATION SHEET
Civil Action# 07-cv-3240
Total Deleted Page(s) = 33
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FEDERAL BUREAU OF INVESTIGATION

FOI/PA

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OPTIONAL FORM NO. 10 JULY 1973 EDITION GSA FPMR (41 CFR) 101-11,6

'JNITED STATES GOVERNMENT

# Memorandum

TO

SAC, SAN FRANCISCO (9-NEW)

DATE:

1/16/76

FROM:

SUPERVISOR BRYON Q. WHEELER

SUBJECT:

Secretary American Indian Party

860 Northpoint

San Francisco, California RONALD REAGAN - VICTIM

EXTORTION

At 2:45 p.m. 1/16/76, ROBERT MOORE, Liaison Section,

SOG, advised he

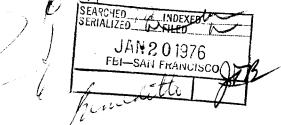
against RONALD REAGAN. He advised Secret Service in Washington had been informed of this and that a copy of the letter would be forwarded to San Francisco upon receipt of same.

At 3:05 p.m., 1/16/76, SA BOB SOWERS, Secret Service, San Francisco, was advised of the receipt of this letter

ACTION: O & A NEW 9 case.

5/3/9C RY SSA 803 ROD/8 405, 193

BCW:j1 (2)



Ronald Réagan-1863



Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan

b2

b6

b7C

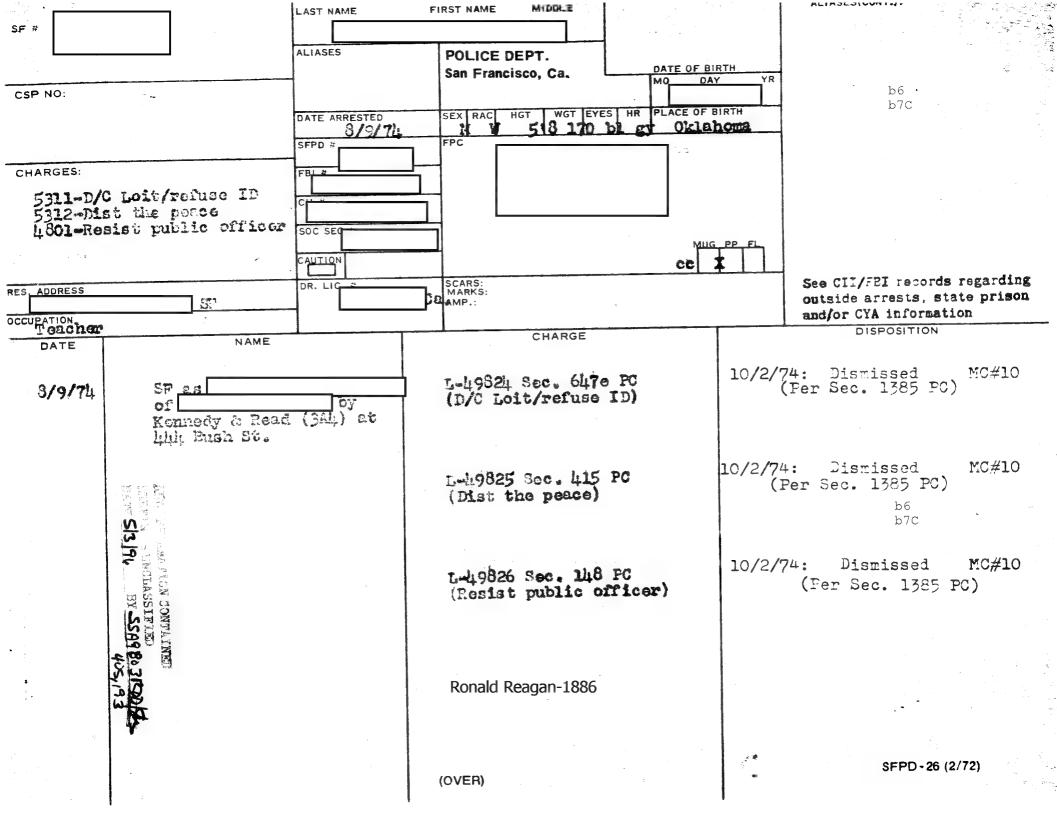
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9-2913-2

INCIDENT REPORT FORM



The follows	THE STREET	STATE OF CALIFORNIA DEPARTMENT OF JUSTICE BUREAU OF IDENTIFICA P.O. BOX 13417, SACRAMEN	ATION	## #
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8-9-74	PD SAN FRANCISCO		1)647E PC D/C LOIT/ REFUSE ID 2)415 PC.DP 3)148 PC RESIST.PUB OFFICER	b6 b7C
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# UNITED STATES DEPARTMENT OF JUSTICE

PEDERAL HUSEATT OF INVESTIGATION

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CONTRIBUTOR OF AREEUTED OR NAME AND NUMBER CHARGE PRODUCTIONS RECEIVED 4-15-63 tail to prov dism Fresno CA b6 b7C 5311 D/C loit/ 8-9-74 PD refuse ID San Fran CA 5312 dist the peace 4801 resist Public Officer Ronald Reagan-1888 ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

DATE 5/3/96

BY 55A983

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				b70	<u></u>
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X 1. Male	3. Chinese	2. 5' to 5'3"	2.101 to 12		2. 18 Nu 21
2. Female	☐ 4. Mexican	3. 5'4" to 5'6"	3. 121 to 14		3. 22 to 25
	5. Filipino	🕱 4. 5'7" to 5'10"	4. 141 to 16		4. 20 to 10
3. Other	☐ <b>●</b> Japanese	🔲 5. 5'11" to 6'	1 5. 161 to 18		6. 36 to 40
	7. Amer. Indian	6. 6'1" to 6'3"	7. 201 to 2		7. 41 to 45
	☐ 8. OTHER	7. 6' 4" and over	☐ 8. 221 to 25	•	<b>№</b> 8. 46 to 60
		For ½" use next highest box	☐ 9. 251 and D¥	ter	9. 61 and over
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HAIR COLOR	HAIR TYPE	EYE COLOR	ETE DEFECTS	COM	San Land
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🔲 2. Red	2. Thinning	☑ 1. Blue ☐ 2. Grey	2. Left eye		2. Medium
3. Brown	3. Curley / Kinky	3. Brown	3. Glasses (Rx)		3. Dark
☐ 4. Black	4. Wavy	4. Black	4. Contact lens	1 100	
5. Grey	5. Straight 6. Bushy	5. Hazel	5. Sun glasses 6. Cross-eyed	LIPS	
☐ 6. Partially grey ☐ 7. White	7. Long sideburns	6. Maroon	7. Eyes toe-out		☐ 1. Large / puffy
8. Sandy	8. Crew cut	☐ 7. Green	8. Excessive blin	nking	☐ 2. Inin
9. OTHER	9. Processed	8. OTHER	9. OTHER		1 4. OTHER
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1. Slender	1. Round / moon	1. Mustache	2. Caulifower Lt.	2. Prot. lowe	rs 2. Broken English
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☐ 3. Heavy / fat	3. Square	3. Goatee	5. Earring Right	5. Silver visi	ble   1 4. Stuttering
🔲 4. Husky	4. Sunken	4. Must., beard, goatee	6. Adhering lobes	6. Excess. s	tain 5. Drawi
5. OTHER	5. Acne, pockmarked	☐5. Beard, goatee	7. Enlarged lobes		Lay Dumb
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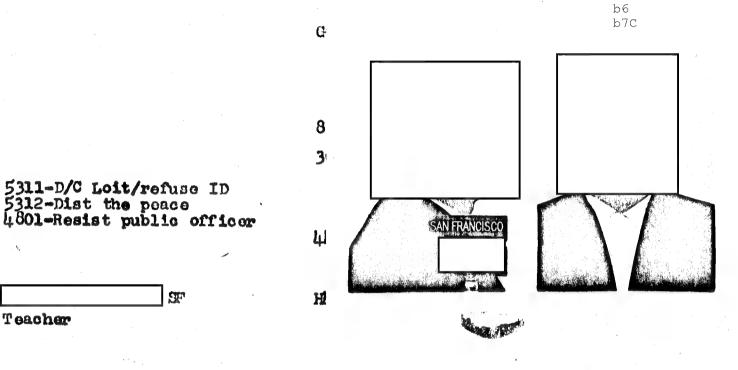
# DISPOSATION OF ARREST AND COURT ACTION

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DARKING WARRANT

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8/9/74

Teacher

SP as of [ Kennedy & Read (3A4) at 444 Bush St. L-49824 Sec. 647e PO (D/C Loit/refuse ID)

b6

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L-49825 Sec. 415 PC (Dist the peace)

L-49826 Sec. 148 PC (Resist public officer)

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

	*	
NR 053 WA PLAIN		
10:59PM NITEL 2-26-76 VLN		
TO WASHINGTON FIELD (9-3862)	b( b'	-
SAN FRANCISCO		
FROM DIRECTOR		•
RONALD REAGAN - VICTIM; E	XTORTION.	•
RE WFO AIRTEL FEBRUARY 4, 1976, SUBMIT	The state of the s	4
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DATE-HIL AL BY SSA9803 RDDA.

FEB 26 1976

Julito

### UNITED STATES GOVERNMENT

# Memorandum.

Memoranaum	21
TO San Francisco	DATE: 11-8-77
FROM WEO	RUC
SUBJECT: Shreat against former	File Destruction Program
SUBJECT: Shuat against former  (Title) Ronald Regign.	
Enclosed are items.  These items are forwarded your office since:	
All logical investigation completed in this Di	ivision
You were OO at the time our case was RUC'd	l.
Enclosures are described as follows:	
2) Lat Reports	
513194 SSA9803 RUPL 81-3	SEARCHED INDEXED SERIALIZED THE DELLE
Enc. 3	PIGINAL ENCLOSURES.

NOTE: DO NOT BLOCK STAMP ORIGINAL ENCLOSURES.

ドラびんじ ロッチーレレジュ

Jan. 14, 1976

Mr. kichafd D. Gravelle General Counsel Fublic Utilities Commission State of California San Francisco, CA.

Ronald Reagan-1908

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE SI3196 BY SSAGROJA

Dear Mr. Gravelle;

I wrote you a letter last March and received from you a letter dated March 7, 1975, concerning the improper and neeligent investigation made into a complaint made by this person against the Pacific Telephone Company and the Fublic Utilities Commission in the person of Mr. William R. Johnson.

I have since been denied any claim against the State and denied civil process and denied Constitutional guarantees of a citizen.

I have since that date been subject to one attempt to poison me by what I believe to be directly related persons to the above mentioned agencies and the civil servants of San Francisco against which I now have a law . suit pending.

I have advised my sen, who since the attack upon my person in the Facific Télephone Company, 444 Bush Street, San Francisco, August 9, 1974, and who et that date did work for the Pacific Telephone Company, and to this date does not know of my difficulties with the lacific Telephone Company or the City of San Francisco, and who since that date had multiple occassions at his job in which lacific Telephone Company personnel did threaten his life and safety, and who did finally receive a bodily damaging attack by two relatives of the Pacific Telephone Company personnel where he worked, causing actual body damage when struck by fists and a chair by the two persons who battered him, and because of these things I advised him to cuit the work before lacific Telephone Company killed him.

I have since that date had my telephone repeatedly tapped, and illegally so.

Sir, you may be fooled by the facade the Facific Telephone Company throws up for you to see, but not I, for I, and my family are the persons to rec eive the brunt of their blows.

I am going to have to advise you that if any member of my family is killed as a direct result of criminal activity of the lacific Telephone Company or servants of the Public Utilities Commission working under or with that body, that I shall meet out to the members of the Foard of Directors punishment inkind, and for the State, the same holds true since you refuse to investigate the complaints made against that public utility, as is your duty, and I shall hunt down those whose duty has been shirked and through malicious neglect have jeapordised my and my families lives, and bring punishment to them. This after suitable Visilance Committee trial, of course.

Jfi	nd the	herra	ssment	oiver	n me b	v the	Tacific	Telephone	Canna		
end i	believ	e they	are e	6111	loreo les		· nerric	rereluone	Company	to cen	rtinue
		• • • •		CIII ,	MVOIV	ua in	activit:	<u>ies</u> against	my well	being	

Sincerely yours,

cc: US Justice Department

b6

b7C

Sheet hard

March 7, 1975

b6 b7C

94109 San Francisco, CA

Your documents indicating a claim against the Publicutilities commission of the State of California and Mr. William R. Johnson, Secretary of that Commission, which were mailed to Governor Brown, have been routed to this office.

Any claims against a state agency or employee acting for such agency must be filed with the Board of Control, 915 Capitol Mall, Room 102, Sacramento, California 95814.

Any notices or correspondence on this matter should be addressed to the California Department of Justice, 555 Capitol Mail, Suite 850, Sacramento, California 95814.

Your documents are being returned to you for appropriate disposition.

Very truly yours,

Richard D. Gravelle Ganeral Counsel

Enclosures

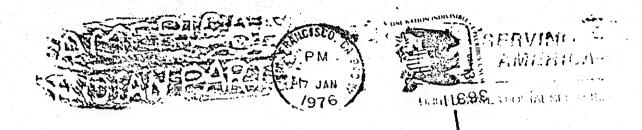
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RDG/SR/gd

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TE PICHARD D. CENTELLE, CENTELL COUNSEL TURNIC UTILITIES COMMISSION STATE OF CALIFORNIA BUILDING SIN FRANCISCO, CA.94102

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Bom Francisco, CA.

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DATE 5396 BY SSA 9 803 RD 18.

Ronald Reagan-1910

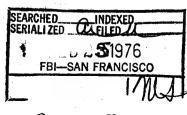
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Item	Date Filed		Disposition
1	2/35/76	8/10/14a	
2.	11/30/7	letter From Ronald	
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Ronald Reagan-1911





9-2983-1A

9 25/2 1	
File No. 7-3862-117	
Daie Received 3/5/1/6	
From	
(NAME OF CONTRIBUTOR)	
(ADDRESS OF CONTRIBUTOR)	
Battle STATE)	
(NAME OF SPECIAL AGENT)	
To Be Returned Yes Receipt Given	Yes
Description:	No
Ronald Reason - Victim	
Romovel Reagon - Victim	

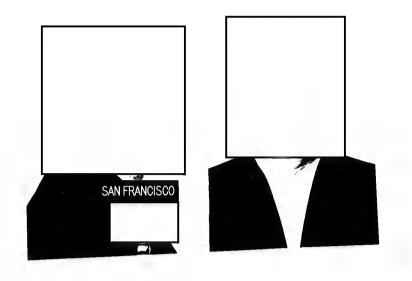
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DATE 5/3/96 BY SSA 903 ROD 405, 193

9-2983-14(2)

File No	9-	2983	
Date Receiv	ed	2-20-70	
From	SFP		
	S(S)	ONTRIBUTOR)	
	(ADDRESS OF	CONTRIBUTOR)	
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JAM	CS /	BENEDE	5770
To Be Returne	(NAME OF SPI	Receipt Given	Yes
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/-	SFPD	PHOTOGRA Of	рН
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FEDERAL BUREAU OF INVESTIGATION FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 07-cv-3240
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Total Deleted Page(s) = 15
Page 9 ~ Duplicate;
Page 13 ~ Duplicate;
Page 14 ~ Duplicate;
Page 15 ~ Duplicate;
Page 16 ~ Duplicate;
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Page 18 ~ Duplicate;
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Page 22 ~ Duplicate;
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Page 28 ~ Duplicate;
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UNITED STATES GOVERNMENT

# 1emorandum

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 02-26-2009 BY 65179/DMH/LRP/bls Litigation # 1089424-2

TO :SAC, SF (100=

DATE: 11/10/66

FROM : CLERK I. S. OLSEN

SUBJECT Student, U. & Cgo "/8/61, San Jose, Callet & Legainst Renald Reagan, Gov. Callet	Lect of Colif
On 11/20/66, Mrs.  San Jose phoned to report the following:	
She has always been a Democrat and late afternoon of 11/8/66 she went to STANTON'S Headquarters and a second	

neadquarters and a group of four went out to an assigned area to make house calls merely to ask if they had voted yet. No mention being made how to vote, but just vote.

She was assigned a young man by the mans of -last name unknown. He said he was a student at Uni. of Chgo, short, small build, light on his feet, brown eyes, slavic face, short chin, 20 to 22, clean.

b6 b7C

After finishing their area, she picked him up and returned him to STANTON'S Headquarters. She found out while he was in her car that he was very much anti Vietnam. The conversation continued and then returns re REAGAN began to come in on car radio and they talked of REAGAN. He became highly incited and said "WE'LL KILL HIM--ASSASSINATION IS JUSTIFIED AS A TOOL."

believed this should be reported as she is not in favor of killing anyone. As a matter of fact, she said that she did not vote for STANTON. She doubts if anyone would know his last name. She said if he is a student at Univ. of Chicago, how come he is out here? Also, he did not vote here as he is not registered in Glifornia.

For info.

iso (2) Ronald Reagan-2666

ED 5215

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 02-26-2009 BY 65179/DMH/LRF/bls

FRI

DALL	2 02 20 2003 DI 03173/DAM/BRI/D		
	gation #1089424-2	Date: 11/10/66	1 
lransn	nit the following in	(Type in plaintext or code)	
/ia	TELETYPE	ROUTINE	
,		(Priority)	
	TO: DIRECTOR AND LO	OS ANGELES	
	FROM: SAN FRANCISCO	O (62-new)	
	LAST NAME UNI	KNOWN), STUDENT, UNIVERSITY OF CHICA	AGO:
		TE RONALD REAGAN, GOVERNOR-ELECT OF	·
	NIA, 11/8/66, SAN JO		
	MRS.		
	SAN JOSE, CA	ALIFORNIA, TELEPHONE	
	, TELE	EPHONICALLY ADVISED THAT LATE IN THE	AFTER-
	WILLIAM STANTON, CAN	CHT LAST, SHE WENT TO THE HEADQUARTE  PE-ELECTION TO  IDIDATE FOR CALIFORNIA STATE ASSEMBL	LY, SAN b
	JOSE, CALIFORNIA, AN	D THEREAFTER GROUPS OF FOUR WENT OU	JT TO
		KE HOUSE CALLS INQUIRING IF INDIVID	
		D VOTED AND TO ENCOURAGE SUCH RESID	
		HEY CAST THEIR BALLOT. MRS.	] WAS
	ASSIGNED A YOUNG MAN	BY THE NAME OF(LAST NAME UN	KNOWN)
	WHO CLAIMED TO BE A	STUDENT AT THE UNIVERSITY OF CHICAG	O. SHE
	DESCRIBED THIS INDIV	IDUAL AS SHORT IN STATURE, SMALL BU	ILD,
	BROWN EYES, SLAVIC FA	ACE, SHORT CHIN, AGE TWENTY TO TWEN	TY-TWO
	YEARS.	rched	
	( 1) SIM TIME TOCO	Ronald Reagan-2667	
	UK	Sample III	
Δn	proved:	2000 10	·
Yhi	Special Agent in Char	rge Sent M Per M	
	* *	62-15315	- 2

### FBI

	Date:
ansmi	t the following in(Type in plaintext or code)
	I .
	(Priority)
	AFTER FINISHING THEIR AREA, SHE AGAIN PICKED THIS YOUNG
	MAN UP AND DROVE HIM TO STANTON HEADQUARTERS. SHE RELATED THAT
	WHILE IN HER CAR THIS SUBJECT WAS VERY MUCH ANTI-VIETNAM IN HIS
	CONVERSATION, AND WHEN ELECTION RETURNS STARTED TO COME IN OVER
	HER CAR RADIO SHOWING THAT RONALD REAGAN HAD TAKEN A LARGE LEAD
	OVER INCUMBENT EDMUND G. BROWN FOR GOVERNOR, SUBJECT BECAME
	HIGHLY EXCITED AND SAID "WE'LL KILL HIM - ASSASSINATION IS
	JUSTIFIED AS A TOOL." MRS. STATED THAT IN VIEW OF SUB-
	JECT'S REACTION AND HIS STATEMENTS, SHE FELT THIS SHOULD BE be
	BROUGHT TO THE ATTENTION OF APPROPRIATE AUTHORITIES.
	AGENT LARRY NEWMAN, SF OFFICE, U. S. SECRET SERVICE, AND
	SAN JOSE PD AND SO NOTIFIED.
	LOS ANGELES ADVISE REAGAN OR APPROPRIATE REPRESENTATIVE
	AND LOCAL AUTHORITIES. SF WILL MAKE INQUIRY AT SAN JOSE IN
	EFFORT TO IDENTIFY SUBJECT AND LHM WILL BE SUBMITTED
	Ronald Reagan-2668
App	roved:M Per Special Agent in Charge
	real regions in onardo

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 02-26-2009 BY 65179/DMH/LRP/bls Litigation # 1089424-2

FBI

Transmit the following in		Date: PLAIN		11/10/66	
		(Туре	in plaintext o	or code)	
Via _	TELETYPE	URGENT			
			(Prio	rity)	

TO DIRECTOR AND LOS ANGELES FROM SAN FRANCISOO (62-new)

b6 b7C

(LNU), STUDENT, UNIVERSITY OF CHICAGO; THREAT TO ASSASSINATE RONALD REAGAN, GOVERNOR-ELECT OF CALIFORNIA, NOVEMBER EIGHT,

NUNKTERNY NINETEEN SIXTY SIX, SAN JOSE, CALIFORNIA.

RE SAN FRANCISCO TELETYPE NOVEMBER TEN, SF TEL CALLS TO LOS ANGELES NOVEMBER TEN.

INVESTIGATION SACRAMENTO REFLECTS MR. BATTAGLIA HAS RES ERVATIONS AT HOTEL SENATOR, SUPPOSEDLY LEAVING LOS ANGELES BY AIR EIGHT TWENTY PM NOVEMBER TEN. REAGAN SUPPOSEDLY SPENDING WEEKEND WITH WIFE, PRESUMABLY AT HOME.

IN EVENT LOS ANGELES UNABLE LOCATE REAGAN, ADVISE SAN FRANCISCO XMXEXXX SO THAT WHEREABOUTS MAY BE DETERMINED THROUGH MR. BATTAGLIA, HOTEL SENATOR, SACRAMENTO.

END

Ronald Reagan-2669

Approved: Special Agent in Charge

FBL SAN FRAN

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 02-26-2009 BY 65179/DMH/LRP/bls

Litigation # 1089424-2

FBI LOS ANG.

1-05 AM URGENT 11-11-66 TPE

TO SAN FRANCISCO

FROM LOS ANGELES (175-0)

b6 b7c

(LNU). STUDENT, UNIVERSITY OF CHICAGO; THREAT TO ASSASSINATE RONALD REAGAN, GOVERNOR-ELECT OF CALIFORNIA, NOVEMBER EIGHT, NINETEEN, SIXTY-SIX, SAN JOSE, CALIFORNIA.

RE SF TEL AND LA TELEPHONE CAL TO SF NOVEMBER TEN LAST.

MRS. DOROTHY BERGMAN, SECRETARY TO PHILLIP BATTAGLIA.

CAMPAIGN MANAGER FOR RONALD REAGAN, ADVISED THAT BOTH

BATTAGLIA AND REAGAN PLANNED ON BEING IN THE SACRAMENTO.

CALIFORNIA, AREA TODAY AND WERE ALSO TO CONTACT BATTGLIA-S.

OFFICE AS TO WHEREABOUTS. NO INFORMATION AVAILABLE AS OF

SIX THIRTY P.M., NOVEMBER TEN LAST AS TO THEIR LOCATION. MRS.

BERGMAN ADVISED THAT AFTER CHECKING WITH MRS. BATTAGLIA THAT MRS.

BATTAGLIA DOES NOT EXPECT TO HEAR FROM HER HUSBAND AND HAS NO IDEA

OF HIS EXACT LOCATION.

SAN FRANCISCO LOCATE BATTAGLIA AT SACRAMENTO AND ASCERTAIN
WHEREABOUTS OF REAGAN. ADVISE BATTAGLIA TO INFORM REAGAN RE THIS
MATTER. ADVISE LOCAL AUTHORITIES REGARDING THREAT IN REFERENCED SEL
LOS. ANGELES POLICE DEPARTMENT ADVISED.

END

Ronald Reagan-2670

FBI SAN FRAN INTIALS PLS KWL FBI SAN FRAN

Robert Olsen 11-11-66.
KWL advised 13/AM

SEARCHED INDEXED SERIALIZED FILED FILED

ABI — SAN FRANCISOD

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 02-26-2009 BY 65179/DMH/LRP/bls

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Litiga	tion # 1089424-2	Date:	11/14/66	
Cransm	nit the following in	(Type in plaintext	or ordal	
/ia	TELETYPE	URGEN		\   
		(Prio	rity)	
	TO: DIRECTOR AND O	CHICAGO AND LOS A	 NGELES	
	FROM: SAN FRANCISC	00 (62-5315)		   b6   b7C
	(LNU), STUDEN	IT, UNIVERSITY OF	CHICAGO, THREAT	1
	ASSASSINATE RONALD			
	NOVEMBER EIGHT, SIX	TY SIX, SAN JOSE	, CALIFORNIA, MI	SCELLANEOUS -
	INFORMATION CONCERN	ING.		
	RE SF TEL TO BUR	EAU NOVEMBER TEN	, LA TEL TO SF,	NOVEMBER
	ELEVEN, AND SF TEL	TO BUREAU NOVEMB	ER ELEVEN.	
		ADVISE	D ON NOVEMBER TH	IRTEEN THAT
	ONE	EMPLOYED BY		b b
	SAN JO	SE, ASSOCIATES W	ITH	PERSONNEL,
	AND APPEARS TO FIT	DESCRIPTION OF	LNU.	
			SAN JOSE (PR	OTECT BY
	REQUEST), ADVISED O	N NOVEMBER FOURT	EEN THAT	
		, I	S AN	
			SAN JOSE.	CAME
	TO SAN JOSE JUNE SI	XTY SIX TO SPEND	ONE QUARTER OF	HIS TIME WITH
		ONE QUARTE	R DOING SOCIAL W	ORK ON EAST
	SIDE OF SAN JOSE, A	ND ONE HALF TIME	WITH	
	DESCRIBED	AS AN "ACTIV	IST" AND SQ "FAR	OUT" THAT
	SAN FRANCISCO	^		
<u>L</u>	MES:ER K		Ronald Reagan-2672	<u> </u>
Αţ	oproved:	Sent W	M Per	/
	Special Agent in C	narge	7"	

62-5315-6

### FBI

Date:

Transmi	t the following in(Type in plaintext or code)
	2
ia	(Priority)
	HE COULDN'T ALLOW HIM TO WORK WITH THE YOUNG PEOPLE OF
	NOW WORKS PART TIME
	WITH AND THE REMAINDER OF HIS TIME
	IN SAN JOSE UNDER NO PARTICULAR SUPERVISION.
	WAS BORN IN CANADA, IS NOT AN AMERICAN CIRIZEN, AND ATTENDED THE
	UNIVERSITY OF CHICAGO, FOR TWO
	YEARS. SAID IS AN IMPATIENT YOUNG MAN WHO FEELS
	THAT MANY INJUSTICES PREVAIL AND ONE WHO USES EXTREMELY POOR
	JUDGMENT ON OCCASIONS. SAID HAS PARTICIPATED IN
	NUMEROUS PICKET LINES AND WAS ACTIVE IN THE CAMPAIGN OF
1	ASSEMBLYMAN WILLIAM F. STANTON.
	SAN FRANCISCO DOES NOT INTEND TO EXPAND INSTANT INVESTIGATION
	IN THEREFORE, CHICAGO IS
	REQUESTED TO OBTAIN BACKGROUND AND A PHOTOGRAPH OF
	AT THE UNIVERSITY OF CHICAGO AND AMSD SAME TO SAN FRANCISCO SO
	PHOTO CAN BE EXHIBITED TO COMPLAINANT FOR POSITIVE IDENTIFICATION
	AND APPROPRIATE AUTHORITIES CAN BE NOTIFIED.
	FOR INFORMATION OF CHICAGO, LNU MADE THE STATEMENT ON
	NOVEMBER EIGHT LAST REGARDING GOVERNOR-ELECT RONALD REAGAN TO
	COMPLAINANT "WE'LL KILL HIM - ASSASSINATION IS JUSTIFIED AS A
	Ronald Reagan-2673
App	proved: M Per Special Agent in Charge

b6 b7C b7D

### FBI

	Date:
Γransmit	the following in(Type in plaintext or code)
Via	- 3 -
	(Priority)
	TOOL".
	NO RECORD OF WAS LOCATED AT SAN JOSE PD, SANTA
	CLARA COUNTY SO, AND CREDIT BUREAU OF SANTA CLARA VALLEY.
	LHM WILL BE SUBMITTED ON IDENTIFICATION OF LNU.
	b6
	b7C
į	
	Ronald Reagan-2674
Appı	roved: M Per
	Special Agent in Charge

## UNITED STATES DEPARTMENT OF JUSTICE Immigration and Naturalization Service

630 Sansome Street San Francisco, California Please mile he this File Number

April 12, 1967

(503)

Special Agent in Charge Federal Bureau of Investigation San Francisco, California ALL FBI INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 02-26-2009 BY 65179/DMH/LRP/bls

Litigation # 1089424-2 Dear Sir: The person described hereunder is the subject of a contemplated investigation by this office: b6 San Jose, California b7C (Present Address) Vancouver. B.C.. Canada (Former Addresses) Vancouver, B.C., Canada (Place and Date of Birth) Canada Unknown Nationality Occupation Date of Arrival in U. S. (Name and Address of Last Employer) White male; see 25 - Height 5'4" - weight 140 - Hair Brown - crewcut (Physical description, if known) Please notify this office whether or not the proposed investigation by this Service will interfere with any action contemplated by you. In addition, please furnish, on the reverse, any information your records may disclose relating to the subject. For your assistance any additional information concerning the subject in the possession of this Service, is furnished on the reverse hereof. The subject is under consideration in connection with or as: SEARCHED ME INDEXED Source of information SERIALIZED FILED Deportation proceedings APR 1 4 1967 Determination immigration status FBI - SAN FRANCISCO Applicant for documents SE HAYNES C. FINCH Applicant for naturalization LIAISON DESK Cancellation citizenship X Alien alleged to have communist affiliations. FBI File No. \_ (In duplicate) fruly yours, allen EMIL H. FULLIN, Asst DD for Investigations G-142 (Rev. 11-25-57)

File contains LHM dated November 22, 1966 at San Francisco.

word a popular transfer to the formation .

CHEY RETURNED STAM

(FOR FBI USE)

granavor

Record as follows:

Canton

No additional information to LHN 11/22/66.

Term aver, b.C., Caraca

NO OBJECTION, BUT PLEASE FURNISH ANY DATA OF INTEREST TO E. E. L.

Shalow Damad to the Wastern, m.C., Chara

TRBO True Tro. A mest, or first, on morning

Company of the state of the sta

tane. : , C ... ) tok

This office does (not) interpose objection to your proceeding with your investigation.

Federal Bureau of Investigation

By SE HAYNES C. FINCE LIAISON DEŠK

ALL INFORMATION COMTAIMED HEREIN IS UNCLASSIFIED DATE 02-26-2009 BY 65179/DMH/LRP/bls

Litigation # 1089424-2

450 Golden Gate Avenue, Box 36015 San Francisco, California 94102 62-5315 November 29, 1966

02-3313

Mr. Charles J. Prelsnik Sheriff, Santa Clara County San Jose, California

Dear Sheriff:

Enclosed	for	your	information	<u>i</u> s	a me	emora	ndun	n and	а
photograph of				W	hicl	n may	be	of	
interest to yo	our c	lepart	tment.						
•		_							

b6 b7C

Sincerely,

CURTISO. LYNUM

Special Agent in Charge

1 Addressee Enclosures - 2 1 SF 62-5315

GPG:EREK

Same letter to J. Raymond Blackmore Chief of Police San Jose, California

Selection

Selection

Selection

Selection

Filed

Ronald Reagan-2687

Enclo sent 11/29/66-ER

Litigation #1089424-2

12/16/66

AIRTEL

AIRMAIL - REGISTERED

TO:

DIRECTOR, FBI

FROM:

SAC, SAN FRANCISCO (100-27806)

SUBJECT:

COMMUNIST PARTY (CP), USA -

YOUTH MATTERS

IS - C

Re Seattle airtel and letterhead memorandum, dated 12/14/66.

Referenced communications furnished the following information:

The San Francisco Mime Troup was scheduled to give several performances in the Pacific Northwest and Western Canada in November, 1966, and during the course of this tour, one member of this troup, identified only as allegedly expressed dissatisfaction with the outcome of the recent California elections, and indicated that the "left" in California now only had two choices, one the immediate assassination of Governor RONALD REAGAN and the other to leave California. Further, that this mention of assassination was taken only as a "casual remark" and was not interpreted as a threat or actual plan.

Bureau telephone call, December 16, 1966, instructed that the information contained in referenced Seattle letterhead memorandum be furnished to Governor-elect REAGAN. This information was furnished to Governor REAGAN's office to PHILIP BATTAGLIA, REAGAN's Sacramento office, on December, 16, 1966. The Sacramento Police Department was also advised of this information.

A copy of referenced letterhead memorandum is being furnished locally to Secret Service.

3 - Bureau (RM)

1 - Seattle (AM)(RM)

2 San Francisco (1 62-5315)

GAH/sms #10

(6)

Gallown -

Filed\_\_

Ronald Reagan-2691

2

b7C

Litigation # 1089424-2

19/19/86

LIETEL

To:

MACE, San Francisco Seattle

Director, FSI (100-3-76)

Limited Classification **Review Conducted** Sea Top Serial Form 4-774

COMMUNIST PARTY, USA TOUTH MITTERS INTERNAL SECURITY - C

ResEnirtel 12/14/66 which enclosed letterhead memorandum regarding an appraisal of the California elections by a member of San Francisco Mime Troup.

This will confirm telephonic instructions furnished BAC, San Francisco, 13/16/66 by Inspector Since that associates of Governor-clout Romald Rongan of California and appropriate local authorities be immediately advised of possible threat to life of Covernor-elect Resgan.

Seattle and San Francisco are instructed to closely follow this matter through logical sources and informants for additional information which may tend to substantiate the data furnished by \$2 711-5. Portinent information developed should be impediately furnished the Bureau and interested offices by sprophite committation.

Seattle is instructed to take immediate steps to insure that any information regarding a possible threat to the life of any individual is not handled in a routine, perfunctory manner in the future.

Prior to dissemination at the Bureau, the following sentence was added as a final paragraph on page two of Seattle's letterhead memorandum. Seattle and San Francisco should add same to their copies of this letterhead memorandum.

"Appropriate local authorities have been apprised of the possible threat to the life of Governor-clect Ronald Reagan of California."

Ronald Reagan-2692

Sallowon &

Origin 100-1806 PEOleon 15315-15

67.5315- PEOleon 155



In Reply, Please Refer to File No.

#### UNITED STATES DEPARTMENT OF JUSTICE

#### FEDERAL BUREAU OF INVESTIGATION

Seattle, Washington December 14, 1966

DECLASSIFICATION AUTHORITY DERIVIED FROM: FBI AUTOMATIC DECLASSIFICATION GUIDE DATE 02-26-2009

CONFEDENTIAL

Litigation # 1089424-2

## COMMUNIST PARTY (CP), USA - YOUTH MATTERS

On December 14, 1966, a confidential source advised that the San Francisco Mime Troup had recently toured the Pacific Northwest and Western Canada where they were scheduled to give several performances during November, 1966. During the course of this tour one of the Troup members, identified only as \_\_\_\_\_\_, was in contact with several young Communist Party members who have been involved in Communist Party youth activities in the Pacific Northwest.

b6 b7C

During a conversation between' and these
young communists, expressed his dissatisfaction
with the outcome of the recent California elections. He
indicated that the "left" in California now had only two
choices; one, is the immediate assassination of Governor
Ronald Reagan, and the other was to leave California.
and others of the Troup believed that with
Reagan's election it would be difficult for the "left"
to function in California and the "left" would probably
be subdued to a point where it would no longer be a
cohesive force.

Ronald Reagan-2693

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

El grid Co After

Group 1/ Excluded from automatic a downgrading and declassification

3 Bull & Success of

b7C

## COMMUNIST PARTY (CP), USA - YOUTH MATTERS



The source described the San Francisco Mime Troup as a group of college age young people who generally refer to themselves as members of the "new left". This froup has received publicity for performing skits which generally ridicule Government, big business and religious groups, particularly in their efforts to solve problems of unemployment, civil rights, poverty and the war in Vietnam. The source advised that mention of assassination of Governor Ronald Reagan was taken only as a "casual remark", and was not interpreted as a threat or actual plan.

con

Litigation # 1089424-2

12/14/66

FEL

ATR MAIL

TO:

DIRECTOR, FBI (100-3-76)

FROM:

SAC, SEATTLE (100-18979)

RE:

COMMUNIST PARTY (CP), UMA -

YOUTH MATTERS

II - C

Fuclosed herewith are ten (10) copies of LHK for Bureau and five (5) copies of LHK for Dan Francisco. This LHK contains as appraisal of the California elections by members of the Ban Francisco Nine Troup.

on 12/8/66 and authenticated on 12/14/66.

by on 12/8/66 and authenticated on 12/14/66.

both on 12/8/66 and authenticated on 12/14/66.

both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francisco file Troup member | both of the San Francis

This LNM is not being disseminated at Scattle, and since Scattle not cognizant of investigation by San Francisco Division of the "Mine Troup", dissemination at San Francisco is left to discretion of the San Francisco Division.

This LEM is classified "COMPIDENTIAL" since
this information could result in the identification of
and thereby jeepardize informat's future
effectiveness to detriment of national security.

3 - Bursau (Enc. 10) (RM)

2 - Seattle (100-18979)
(1 - Remains and the security of the security

OPTIONAL FORM NO. 10
MAY 1982 EDITION
GSA FFWR (41 CFR) 101-11.6

UNITED STATES GO \_\_RNMENT

Memorandum

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 02-26-2009 BY 65179/DMH/LRP/bls

Litigation # 1089424-2

TO

SAC, SF (62-5315)

DATE:

12/21/66

FROM:

ROBERT EUGENE OLSON, SA(A)

SUBJECT:

UNKNOWN SUBJECT;

Anonymous Threat Against

RONALD REAGAN, Governor-Elect of California,

To "Denver Post", 12/6/66. INFORMATION CONCERNING

Re Bureau airtel to Denver 12/13/66. Re Denver letter to Bureau 12/6/66.

The information contained in Denver letter to Bureau 12/6\$66, was furnished on 12/21/66, to MR. PHILIP BATTAGLIA, Executive Assistant to RONALD REAGAN, Mr. STEPHEN BYRNE, U. S. Secret Service, and Mr. JOSEPH ROONEY, Sacramento PD, Sacramento, California.

NOTE: CLOSE ADMINISTRATIVELY.

Ronald Reagan-2696



41

# UNITED STATES DEPARTMENT OF JUSTICE IMMIGRATION AND NATURALIZATION SERVICE

#### REPORT OF INVESTIGATION

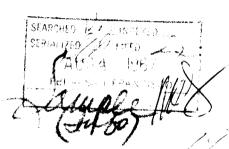
b6 b7C

IN IS UNCLASSIFIED : 02-26-2009 BY 6517		
TLE	Litigation # 1089424-2	FILE NUMBER
an Francisco	July 28, 1967 John D. Stevens	INVESTIGATOR
	SYNOPSIS  JECT entered the United States as a none  He is currently in San Jo	

The SUBJECT reportedly made statements regarding Governor Elect RONALD REAGAN and allegedly said "We'll kill him. Assassination is justified as a tool".

SUBJECT reportedly was involved in picketing of Macy's Department Store at San Jose. Someone was burned by a cigarette and as a result Macy's Department Store is suing the First Methodist Church of San Jose as the SUBJECT was known to be employed by the Church.

for FBI



#### DETAILS

The file reflects t	he SUBJECT is a citi	zen of Canada and was
born on	at Vancouver, Bri	tish Columbia, Canada.
He entered the United St.	ates on September 27	, 1964, at Noyes,
Minnesota as a nonimmigr	ant F student to att	end the University of
Chicago at Chicago, Illi	nois, for	He last
entered the United State	s at Seattle, Washin	gton on September 29,
1965, as a nomimmigrant	student again to att	end the University of
Chicago, as a		

The file contains Service Form I-538, application by nonimmigrant student for permission to accept or continue employment, reflecting that as of January 18, 1965, the SUBJECT was residing at Apt. 405, 5757 University Avenue, Chicago, Illinois. At that time the foreign student advisor of the University of Chicago recommended that the SUBJECT receive permission to accept part-time employment and indicated that the SUBJECT was expected to complete his study in the United States by June 1968. The SUBJECT thereafter executed a similar application dated June 1, 1966, again reflecting he was residing at 5757 University Avenue in Chicago. The foreign student advisor at the University of Chicago again indicated that the SUBJECT was expected to complete his studies in the United States by June 1968 and recommended he be granted "practical training".

b6 b7C

The Service Office at Chicago granted the SUBJECT first and second period of practical training beginning as of July 1, 1966. His authorization to remain in the United States was then extended to September 24, 1967.

Source S-1 furnished a letterhead memorandum dated November 22, 1966, reflecting the SUBJECT had expressed anti Viet New sentiments. During the last gubernatorial election in California the SUBJECT noted that the incumbent EDMUND G. BROWN was apparently losing the election to "Governor-Elect" RONALD REAGAN and he became highly excited and said, of RONALD REAGAN, "We'll kill him. Assassination is justified as a tool."

_	Source S-1 also reported that the SUBJE	
the	but is actually spor	nsored and paid by the
		in San Jose, California.
The	s SUBJECT came to San Jose in 1966 intendi	ing to spend a quarter of
	time with the	and one fourth of
	s time doing social work in the east side her half with the	of San Jose and the The SUBJECT was reportedly
an	"activist" and "so far out" that he was nung people of the	
SF.	. Cal 7/28/67 - 2 -	Ronald Reagan-2698

According to Source S-1 the SUBJECT graduated from the	
He enrolled at the	
in October 1964 as a full-time four-year and upon graduation he will be awarded a	
degree. He is expected to return to the	
for the autumn term beginning October 1967 and then gradu-	
ating in June of 1968.	
The letterhead memorandum of Source S-1 indicates that the	
SUBJECT associated with members of the San Jose W. E. B. DuBois	
Clubs of America and was in attendance at a party given by the	
DuBois Clubs of America at the residence of	
reportedly is a member of the Communist Party at San Jose,	
California.	
According to Source S-1 the SUBJECT resides at	
San Jose, California.	
The same state of the same sta	
The SUBJECT executed a 1967 alien address report card, Form	
I-53, reflecting his address is c/o San Jose,	
California and that he is employed with the San Jose, California;	
that his social security number is	
	b6
	b6 b7C
San Jose, California was interviewed on May 18, 1967.	
She said that church records reflect the SUBJECT was with the	
She said that church records reflect the SUBJECT was with the church from July 1966 to October 1966. He is now at	
She said that church records reflect the SUBJECT was with the church from July 1966 to October 1966. He is now at in San Jose but the continues to	
She said that church records reflect the SUBJECT was with the church from July 1966 to October 1966. He is now at in San Jose but the continues to write his "salary" checks and they see him now twice a month.	
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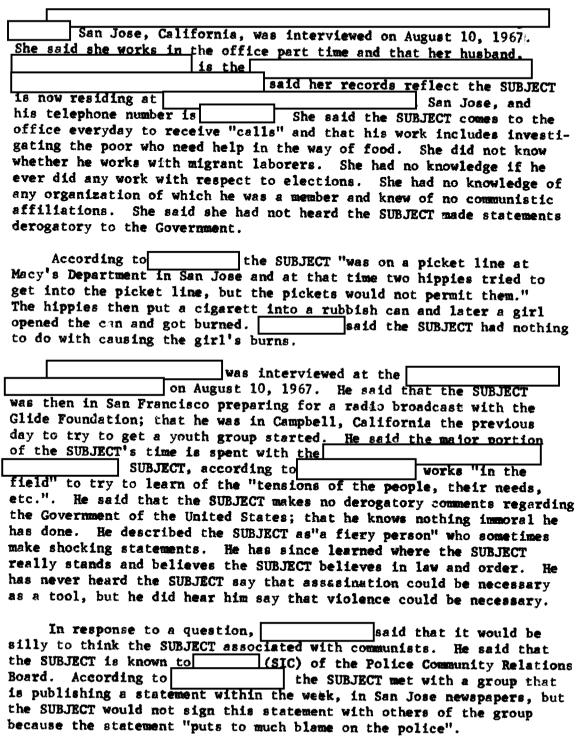
was interviewed on July 13, 1967, at the
San Jose California No.
immediately admitted knowing the SUBJECT. He at first did not wish
to identify himself saying he did not want to become involved. He
alleged that he did not know where the SUBJECT resides saving that
this information could be secured from the
at first would only respond that the SUB_DICT did '
work". He then elaborated that the SUBJECT
and does various things with "as an example a couple of
days ago we unloaded a load of wood".
said that to his knowledge the SUBJECT has
never been arrested and he considers him to he a never of seed
moral character. He has known the SHB.FECT for the nact form works
he suggested that additional information concerning the STRIECT!
activities could be secured from of the
He then added that the SIR IECT works with
migrant labor all over the county. He commented that if the sur your
is in trouble "there are 50 ministers he could get to support him".
and the court fac to subject urm."
San Jose Police Department Arrest No. reflects the
Sum Jose Police Department Arrest No. reflects the
Subject was cited for speeding on April 26, 1967, in violation of
Section 12350 of the California Vehicle Code. At that time he
indicated he was employed as
San Jose. He possesses driver's license No. The
San Jose Police Department had no record that the SUBJECT was ever
arrested for m criminal offense.
The Identification Division of the FBI had no record the SUB-
JECT was arrested under the name

# UNITED STATES DEPARTMENT OF JUSTICE IMMIGRATION AND NATURALIZATION SERVICE

### REPORT OF INVESTIGATION

	· REPOR	T OF INVESTIGA	TION	
ALL FBI INFORMATION (				
HEREIN IS UNCLASSIFIE DATE 02-26-2009 BY 65				
/AID 02-20-2009 DI 03	)I/3/DIMI/MAR/DIO	Litigation #10894	24-2	
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	J			b7C
		$\sim$ $\sim$ $\sim$ $\sim$	/2/	
REPORT MADE AT	DATE	BY		
		12/54	A 11/100	- 191257
an Francisco	Sept. 1, 1967	John D. S	11-31,00	INVESTIGATOR
			-cverson,	INVESTIGATOR
		SYNOPSIS		· · · · · · · · · · · · · · · · · · ·
The		co	onsiders that	the SUBJECT is
properly perfor	ming under the ter	ms of his practic	cal training pr	rogram.
	T attends meetings			
This organizati	on is presently dr	afting an advert	lsement to be	laced in San
Jose newspaper	condemning police	brutality and pla	cing the burde	en of responsi-
bility for deni	al of equality "up	on the power atri	ecture in our o	ountry".
		on one bases are	nocore TH OUL (	.ouncry .
1			manger a construct of the property of the prop	Commission of the section of the commission of the section of
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/			Commen	The Hy
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\ 1	Ronald	l Reagan-2701	, , , , , , , , , , , , , , , , , , , ,	
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for PEI	<u> </u>		<del></del>	<b>*</b>
Francisco			1/ Hu	so)

FORM G-166 (REV. 7-1-64)



said he has asked for the SUBJECT to con-
tinue working with the for one
more intern year. He was asked whether he wanted the SUBJECT to con-
tinue with him to benefit the church or the SUBJECT through his
practical training program and responded that the
question bothered him because he knows they need the SUBJECT, but in
addition he believes the SUBJECT would benefit by receiving additional
time in the San Jose area.   described the SUBJECT's work as
follows: One half of his work is with the
quarter at one quarter for the
regarding, especially, suicide prevention.
was asked whether the SUBJECT has caused anyone in
the Santa Clara Area to dislike him and he responded that some of the
Santa Clara County Supervisors may not like him, depending "on which ones you talk to".

b6 b7C

Ex "A"

Ex "B"

Deputy DONALD TAMM, Santa Clara County Sheriff's Office, was interviewed on August 17, 1967. He said that he is the Community Relations Officer for the sheriff's office and he reports directly to the sheriff. He immediately identified the SUBJECT and described him as probably a social revolutionary, a radical who probably has the tag of ■ commie. TAMM said that he (TAMM) mingles with and attends some of the same groups as the SUBJECT and that they both attended meetings of the Bay Area Emergency Action Committee. According to TAMM, this "committee" intends to publish an article in the San Jose Press, "probably this Sunday". There were two such articles prepared and one article was especially harsh to the police. TAMM said he expects that the "less harsh" article may be the one published and he believes that the SUBJECT was in favor of the "less harsh article". Attached hereto as Exhibit "A" is a copy of the "harsh article" that was drafted by the Bay Area Emergency Action Committee . one of the articles proposed for publication. Exhibit "B" to this report is a copy of a leaflet relating to the formation of the Bay Area Emergency Action Committee on July 22, 1967. The "coordinators" of this committee are listed on the bottom of this leaflet. The SUBJECT's name is not among those named \*\* coordinators. TAMM said that the SUBJECT attends every meeting of this committee because of his "social concerns".

Deputy DONALD TAMM said that he does not believe that the SUB-JECT's presence in the United States is harmful. He had heard that the SUBJECT "had threatened (Govenor) REAGAN". Much of the SUBJECT's work, according to TAMM, is running food drives. He said that the SUBJECT is a hippie; that he never takes a bath; that he wears long sideburns.

SF, Cal 9/1/67

In an article in the San Francisco Examiner by Staff Writer ED MONTGOMERY, on July 31, 1967, the Bay Area Emergency Action Committee is described as having been formed in the Hall of Flowers at Golden Gate Park on July 22, 1967. The article relates that more than a score of identified communists were there to discuss police brutality, etc. One of those attending was the chairman of the Communist Party of Northern California. Communist Party leaflets were distributed according to the article.

The SUBJECT was interviewed on August 17, 1967, at his apart-
ment at San Jose, California. He said that
he has resided at this address since December 1966 and for a while
he resided there with has since gone East.
He plans to request an extension of his practical training program
so that he may remain in San Jose, California with the
for another six months. He claimed he
has no employment at the present except for his work with the
He lelieves that his work is
predominately work under his practical training program and he said
that everything he does is checked out by
that one half of his work is at

b6 b7C

The SUBJECT said that he was not at Macy's Department during the incident when a girl was burned while the store was being picketed. During the time of the incident, he was in Fresno, California, but subsequently did return to picket at the store, but not during the time of the incident.

The SUBJECT claimed he did not recall making a statement to the effect that assasination is justified as a tool. He said that about Christmas time people told him that the FBI was investigating him about this and it was then that he learned that he was supposed to have made this statement. He added that he doubted that he made the statement, but if he did do so, he believes it must have been said in a joking way.

The SUBJECT said that he does not believe he was ever a member of a communistic organization. Asked whether he ever attended a meeting or a gathering of communists, he responded that he attended a longshoremen's meeting at "Union Hall" and listened to a DAVID "something" who went to North Viet Nam and then came back to tell about what he saw there.

The SUBJECT said that his trip to San Francisco last week was to help the Glide Foundation prepare a radio program, which was taped and upon which he participated. The pregram related to the churches "last year's experience with interns".

SF. Cal 9/1/67

The SUBJECT said that he has never been arrested at any time at any place for anything, except for "traffic tickets". To has never been married. He has no current plans to immigrate to the United States.

The Bureau of Criminal Identification and Investigation of the Department of Justice of the State of California had no identifiable record relating to the SUBJECT. The Santa Clara County Sheriff's Office and the Santa Clara Welfare Department had no record of the SUBJECT of July 13, 1967.

b6 b7C

## UNITED STATES DEPARTMENT OF JUSTICE

#### REPORT OF INVESTIGATION

This report contains confidentially furnished information

TIPLE

FILE NUMBER

b6
b7c

REPORT MADE AT

DATE

San Francisco

Jan. 19, 1968

John D. Stevesson

INVESTIGATOR

SYNOPSIS

Personnel at Macy's Department Store at San Jose are unaware as to the outcome of the incident wherein a girl was burned during a demonstration held in front of the store.

The files of the Zurich-American Insurance Companies at San Francisco mentioned the SUBJECT's name with regard to the incident mentioned above, but the SUBJECT is not mentioned per se as having been responsible for the injury to the girl.

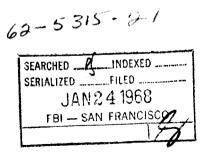
ALL FBI INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 02-26-2009 BY 65179/DMH/LRP/bls

Litigation #1089424-2

Ronald Reagan-2706

Copy for FBI San Francisco

This report contains comes tightly "



### DETAILS On

DIANNE KUCKENS, personnel records clerk, Macy's Department Store, Stevens Creek Boulevard, San Jose, California, said that information regarding all injuries and related incidents are brought to the attention of the personnel department. She recalled the incident wherein the store was picketed in 1966 at which time a young girl was injured. She said that Macy's Department Store in San Jose would maintain no records regarding the incident as the case was immediately handled by their insurance company, Zurich-American Insurance Companies, on Montgomery Street in San Francisco, California.

berrand or residence of the second of the se	
Zurich-American Insurance	
Companies, 417 Montgomery Street, San Francisco, California, was inter-	
wiewed on December 26, 1967. He said that their file, relating to the	
shove mentioned incident, is File and is the case of	
ws. Macy's. The date of the incident is December 17, 1966.	
According to his file, age the daughter of	
was burned on December 17, 1966, after she had left Macy's	
Department Store on Stevens Creek Boulevard in San Jose and attempted	
to place a candy wrapper in a waste container. There was a fire in	
the waste container and as a result was burned on	
the arm. The file of the Zurich-American Insurance Company contains	
a San Jose, California police report, No. 140/2, a police report by	
police officer HALL Badge No. This report reflects essentially	
that the suspects who caused the fire in the waste container were	
born on of San Jose, and	
born on and who resides at	
city not given. Police officer HALL's report reflects that	
he observed the two "suspects" depositing ashes from a cigarette	
into the ash can, which started to smoke and burn. The suspects	b6
were working for United Farm Workers Organizing Committee which was	b7C
DESCRIPTION OF DESCRIPTION DESCRIPTION OF ANY ACCURATION OF THE PROPERTY OF TH	
SUBJECT's name is not mentioned in any part of that report.	
The above referred to file also contains a report dated Janu-	
ary 9, 1967, by	
tion contained in that report should be considered as confidentially	
furnished according to The report shows that the	
SUBJECT was a chief organizer of the "boycott" at "San Jose Macy's".	
The report does not reflect anywhere that the SUBJECT was present at	
the time of the incident where the girl was burnedinter-	
viewed the two previously mentioned suspects and they denied starting	
the fire.   slso interviewed police officer HALL and HALL	
told that a paid union organizer was present at Macy's	
sixteen hours a day. The SUBJECT's name was not mentioned in the	
'HALL interview. On June 9, 1967, wrote a	
SF, Cal 1/19/68 - 2 -	
Ronald Reagan-2707	

This report contains confidentially from the confidentially from the confidential beautiful to the confidential transfer of the conf

## This report compains confident tielly four the following

memorandum from his San Jose, Colifornia office to their office in San Francisco and that memorandum reflects that they do not intend to name the SUBJECT or the
On May 2, 1967, the Zurich-American Insurance Companies at San
Francisco, according to their file, sent a letter, essentially the
same letter, to the United Farm Workers, at Delano, California, to
the SUBJECT, the the
and the City of San Jose, California and all
of the letters stated in effect that liability regarding the injury
to may rest with the receiver of the letter. The
at San Jose responded by a letter dated
May 5, 1967, to advise the Zurich-American Insurance Companies that
the SUBJECT was affiliated with them only from August to October
1966 and as such could not be liable.
The above referred to file reflects that the family of
has entered Santa Clara Superior Court Suit against
Macy's; that the suit was entered about November 1967. The suit
covers four amounts for collection: \$50,000, \$25,000, \$10,000 and
\$25,000. The defendents in the suit are the United Farm Workers
Organizing Committee of the AFL-CIO,
Valley Fair Shopping Center, Macy's, and "Does one
through fifty". The SUBJECT's name was not mentioned as a defendent.

SF. Cal 1/19/68

b6 b7C

Ronald Reagan-2708
This report of this confident
tickly from Los week Lieu

## UNITED STATES DEPARTMENT OF JUSTICE IMMIGRATION AND NATURALIZATION SERVICE

#### REPORT OF INVESTIGATION

ALL FBI INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 02-26-2009 BY 65179/DMH/LRP/bls Litigation #1089424-2 FILE NUMBER TITLE DATE REPORT MADE AT Investigator San Francisco NAMEDIAN DETAILS b6 was interviewed on December 28, 1967, at her home b7C San Jose, California. She identified the at SUBJECT through his photograph and said she recalled his name was either She said she met him on only one occasion. She orsaid that she, the SUBJECT, and another couple were assigned to canvass a local neighborhood to encourage people to go out and vote. The other couple went off in their car and she took the SUBJECT in her car to the neighborhood. While in the neighborhood they separated, she canvassing one part of the neighborhood and the SUBJECT another. She returned to her automobile first and while listening to the radio she heard that RONALD REAGAN may win the gubernatorial election. When the SUBJECT returned to the car she told him that RONALD REACH May win and the SUBJECT responded by cursing. She then added to the SUB-JECT that REAGAN may be a figurehead for certain interest and the SUBJECT replied, in the car while they was driving back to the "democratic headquarters" something to the effect that "well kill REAGAN". She said that her response to this indicated she was shocked and the SUBJECT replied something to the effect that assassination is a tool. She said she cannot recall too well now what was said as this took place during the elections in November 1966. After the SUBJECT made these comments there was very little further discussion in the automobile, primarily because she does not talk too much while driving. She then let the SUBJECT out of the car at the "same democratic headquarters" where she picked him up. As an after thought she then entered the "headquarters" to look him over. She did not see the SUB-JECT again and recalled very little else about him except that he had a Canadian accent and when she mentioned this to him he denied he was Canadian. Ex "A" Attached hereto 🖴 Exhibit "A" is an affidavit executed by December 28, 1967. In that affidavit she mentioned she heard JECT say that "well kill REAGAN". \_\_\_\_\_\_ is willing to appear in the SUBJECT say that is willing to appear in any hearing regarding the SUBJECT, in Service proceedings. SEARCHED \_\_ 62-5915-20 SERIALIZED \_\_\_\_ FILED JAN241968 for FBI, San Francisco FBI - SAN FRANCIS Ronald-Reagan-2709 FPI-LPC-10-76-37M-3330

FORM G-166 (REV. 7-1-64)

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Ronald Reagan-2710



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File No. 62 - 5315 Litigation #1089424-2
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FEDERAL BUREAU OF INVESTIGATION FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 07-cv-3240

Total Deleted Page(s) = 2
Page 7 ~ Duplicate;
Page 8 ~ Duplicate;

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## $\dot{M}emorandum$

то :	SAC, SAN FRANCISCO	(62-0) 16-1	DATE: 4/10/68	
FROM :	SA DONALD E. LOVEJ		COMPATION CONTAINED	
subject:	UNSUB Miscellaneous		CORMATION CONTAINED US LINCLASSIFIED US SSA9803RDD/JA (405,193)	r
	Ax 5:30 P.M. this		ornia, advised he	
is curre	htly employed at at	doing	telephone work.	
casian.		an	from work with d that both are cau- Qakland, tele-	b6 b7C b7D
either i although the colo	tanding by    walked up in compa   or	vehicle, wait ny with a colore and whom he ha he individual by on the ther identificat	3:35 this afternoon, sing to go home, when ed man, who is employed as seen in and to and to stated this	ed d
words as	and the colored ma had quote get REAGAN."	n before they pa d the colored ma said he had fe of Governor R	an as saying, "We are	<u></u>
DEL:dl				
B	Robert C. Riedel - will under	Jugar - Sact	Ronald Reagan-1915	
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#### FBI

Date: 4/11/68

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Via	12021112		(Priority)		
	то	DIRECTOR		ALC INFORMATION CONTAIN HEREIN IS UNCLASSIFIED DATE 3-14-96 BY 35	10 5000 /10
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	DURIN	IG THE EVENING HO	URS OF APRIL TE	N LAST,	
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#### FBI

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	(Type in plaintext or code)
	(Priority)
_	SF 62-New
	PAGE TWO
	THE FOLLOWING WERE NOTIFIED OF THE ABOVE ON INSTANT
	DATE: SA ROBERT C. RIEDEL, SUPERVISOR, SACRAMENTO OFFICE,
	WHO ADVISED HE WAS REPORTING THIS IMMEDIATELY TO ERNEST  B. SMITH, ASSISTANT LEGAL AFFAIRS SECRETARY, OFFICE OF
	GOVERNOR REAGAN; SPECIAL AGENT WILLIAM TIMOTHY MC INTYRE,
	SECRET SERVICE, SAN FRANCISCO; MRS. JUANITA STERNE,
	DETECTIVE BUREAU, ALAMEDA POLICE DEPARTMENT; AND SERGEANT
	JOHN MOORE, INTELLIGENCE, ALAMEDA COUNTY SHERIFF'S OFFICE.
	AIR MAIL COPY TO SACRAMENTO. LHM TO FOLLOW.
	Daniel Danier 1017
	Ronald Reagan-1917

AIRTEL.

AIRMAIL

TO: DIRECTOR, FBI

POM: SAC, SAN FRANCISCO (62-5462)

UNSUB; Threat Against Governor RONALD REAGAN of California, April 10, 1968, Alameda, California MISCELLANEOUS - INFORMATION CONCERNING

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED
DATE 3-14-96 BY SSA 9803 RDD / TAC

There are enclosed the original and three copies of a letterhead memorandum in this matter for appropriate dissemination.

Copies of this LHM have been disseminated to U. S. Secret Service, San Francisco; Alameda County Sheriff's Office, Cakland, California; the Police Department, Alameda, California; and to Naval Intelligence Service Office, San Francisco.

Four copies of this LHM are being enclosed for Sacramento, which office should make appropriate dissemination to the office of Governor RONALD REAGAN and local authorities.

3 Bureau (Encs. - 4) 2 Sacramento (Encs. - 4) (1)San Francisco

GPG:ER % (6)

Ronald Reagan-1920

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serial cold

Indexed

Filed

Enclo. sent 4/11/68-98

450 Golden Gate Avenue, Box 36015 San Francisco, California 94102 April 12, 1968

Mr. Frank I. Madigan Sheriff, Alameda County 1225 Fallon Street Oakland, California 94612

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-14-96 BY SSA9803 RAD SAC
(405, 193)

Dear Sheriff:

1 Addressee

SF 62-5462 1 SF 80-461

GPG:ER U

Enclosure - 1

There is enclosed a memorandum setting forth information pertaining to a possible threat against the life of Governor Ronald Reagan, which information was furnished telephonically to your office on April 11, 1968.

Sincerely yours,

CHARLES W. BATES

Special Agent in Charge

Limited Classification Review Conducted See Fop Serial

Same letter sent to: Form 4-774

Alameda, California, Police Department

Dissemination also made to: U. S. Secret Service NISO, San Francisco

Ronald Reagan-1921

Encl. sent 4/12/68-9R

62-5462-5

## Reagan Asks Carmichael: Delay Speech

Republican Ronald Reagan yesterday called on Black Power" advocate Stokeley Carmichael to cancel a scheduled speaking appearance on the Berkeley campus.

Carmichael, head of the Student Non-violent Coordinating Committee, is due to speak October 29, and student sponsors of the event had invited Reagan to debate the "Black Power" question.

In declining the invitation, Reagan urged the Negro leader to delay his appearance "at least until after our State elections."

The gubernatorial candidate said "an atmosphere of calm, and goodwill" is "inperative" at election time.

Carmichael's appearance, Reagan said in his wire, "will stir strong emotions and could possibly do damage to both parties."

"You would be doing service to your cause and to our State if you decline to appear at this time."

Feagan urged Carmichael to hold off your appearance until a later date when any proposals you have to offer can be considered calmly and rationally." Rodrig Gager (7/40)

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(Indicate page, name of newspaper, city and state.)

11s.F.Chronicle

San Francisco, Calif.

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-14-96 BY 35A9803 ROD/54C
(405, 193)

Date: 10-19-66 Edition: Final Home

Author:

Editor: Chas.deYoung Thieriot

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Submitting Office:

Being Investigated

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Ronald Reagan-1922

80-990-

# Reagan Has

OSAN DIEGO (AP) — Ronald eagan said in ■ press conference Wednesday afternoon there will pot be ■ debate between himself and Gov. Edmund Brown unless Brown agrees to meet him in a face - to - face appearance, in which questions are not asked by newsmen.

Reagan, the Republican gu-Bernatorial nominee, said this would be in the format of the Murphy-Salinger debate in 1964 in California, rather than the 1960 televised debate formula between Richard Nixon and John F. Kennedy.

Reagan called this "'legitimate debate on issues determined by the polls."

A stalemate has developed, Leagan said, in negotiations between committees appointed by Gov. Brown and himself to establish debate conditions.

proney L. (8/13)

HEREIN IS THE SET AS SSA 9803PAD THE ALL INFORMATION CONTAINSO

(Indicate page, name of newspaper, city and state.)

Oakland Tribune

Oakland, Calif.

Aug. 11, 1966 Date:

Final Edition:

Author: Editor:

Title:

Wm.F. Knowland

Character:

Classification:

Submitting Office: SF

Being Investigated

Ronald Reagan-1923

SEARCHED \_ INDEXED SERIALIZED\_ FOI-SALL ENVIRONSCO

#### November 9, 1966

Honorable Ronald Reagan Pacific Palisades, California 90272 ALL INFORMATION CONTAINS!
HEREIN IS UNCLASSIFIED
DATE 3-14-96 BY \$5A9BO3RDD LTAE

Dear Mr. Reagan:

Heartiest congratulations upon your election as Governor of California.

Your many friends in this Bureau join me in the hope that your term in office will meet with every success, and we want you to feel free to let us know whenever we can be of service.

With warm regards,

Sincerely yours,

1 - Los Angeles

1 - San Francisco

1 - San Diego

Ronald Reagan-1924

NOV1 41966
FBI — SAN FRANCICO

The first of the state of the s

#### 450 Golden Gate Avenue Box 36015 San Francisco, California 94102 November 14, 1966

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-14-96 BY SSA 9803 RDD/TAC

Honorable Ronald Reagan Pacific Palisades, California 90272

Dear Mr. Reagan:

May I convey my heartiest congratulations to you on your election as Governor of California.

Although I have not had the pleasure of meeting you, our mutual friend Pete Pitchess, Sheriff, Los Angeles County, has talked about you so many times that I feel I know you. I will be looking forward to meeting you in the future.

If we can be of any service in matters of mutual interest in the 41 counties covered by the San Francisco Office of the FBI, please feel free to call on me.

Again, congratulations. Kindest personal

regards.

Sincerely,

CURTIS O. LYNUM Special Agent in Charge

1 addressee (1) SF (80-449) COL:ekk (2)

Ronald Reagan-1925

50-990-4

# Reagan Supported On U.C. Probe Plan

By DEREK SCOEN

SACRAMENTO (AP) seemed certain today of strong port from legislators. legislative backing for his plans to probe the University of Calianti-pornography laws.

At the same time, lawmakers' responses to an Associated Press poll indicated that while mest favor increasing opportun-ities for Negroes, they want streter handling of future racial

ion of the state's death

ished by outgoing Democratic matter as well. Gov. elect Ronald Reagan Gov. Brown — drew little sup-

Opinions expressed in the poll cut screen party lines un sevfornia and stiffen the state's eral issues, including anti-pornography and minority group problems. With Democrats holding slim margins of 42-38 in the Assembly and 21-19 in the Senate, indications were Reagan will require bi-partisan backing for the programs he advances.

Those polled gave virtually unanimous support to investigating the university in the wake of student uprisings on the Berkeley campus this year and in 1964. A majority endorsed Republican Reagan's proposal to appoint a commission to conduct the prohe. But there also was strong feeling that the leg-

penalty - a dream long cher-islature should look into the

Some went even farther. "I believe there have been investigations enough," said Sen. John G. Schmitz, R-Tustin, a John Birch Society member. "The facts about the situation at Berkeley and its incompetent handling by the administration are clear. President Clark Kerr should resign or be d missed . . . "

(Indicate page, name of newspaper, city and state.)

Oakland Tribune

Oakland , Calif.

2

Date:

12/13/66

Edition:

Final

Author:

Derek Scoen

Editor:

Wm.F.Knowland

Title:

Character:

Classification:

Submitting Office:

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Being Investigated

ALL BY GRAVETON SON CARRO HEREIN IS UNUCASSIFIED DATE 3-14-96 BY SSA 9853 RDD/FAZ

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FBI - SHIN FRHINGIOUS

#### UNITED STATES GOVERNMENT

## Memorandum

TO

SAC (Personal Attention)

(80-

DATE:

12/16/66

FROM

SRA PETER T. SEXTON

SUBJECT:

PUBLIC RELATIONS WITH THE GOVERNOR-ELECT

On 12/15/66, SAC CURTIS O. LYNUM and the writer conferred with PHILIP BATTAGLIA, Executive Secretary to Governor-Elect RONALD REAGAN, and DIRK ELDREDGE. recently appointed Special Representative to Mr. REAGAN; the conference took place in the temporary offices of the Governor-Elect in the IBM Building, 520 Capitol Mall, Sacramento. Matters of mutual interest to the FBI and the Office of the Governor were discussed.

Mr. LYNUM mentioned the various interests of the FBI ... they relate to the Governor and to his office, and noted the willingness of the Bureau to cooperate in whatever manner possible. The SAC cited examples of the past wherein the FBI has expended time and effort to investigate matters of interest to the Governor, either personally or officially, and he cited the BOWLES-GREY case, wherein the HALE CHAMPION family were kidnapped. He commented regarding the various reasons why the Governor might be contacted personally by an Agent of the FBI or by the SAC, and examples were cited regarding the manner in which matters had been handled previously with the outgoing Governor.

Both Mr. BATTAGLIA and Mr. ELDREDGE appeared to be impressed, and both expressed appreciation for the visit to their office.

ACTION:

Route to SAC for personal attention.

File.

Ronald Reagan-1927

ALL INFORMATION CONTAINED

HEREIN IS UNCLASSIFIED DATE 3-14- 96 BY SSA 9803 RAD JAC

Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan

### UC and the Colleges

## Reagan's Freeze Falls on Schools

By Carolyn Anspacher

Cold winds, whirling out of Governor Ronald Reagan's proposed "trim, cut and squeeze" financing, already are being felt by the University of California and the State colleges.

It was learned yesterday that representatives of the university and the colleges at a closed-door meeting in Sacramento earlier this

week, heard Reagan and
State Finance Director head" allowance amounting
Gordon P. Smith make to \$7 million or \$8 million a these policy decisions:

- the 1967-68 operating budgets, already approved by the UC Board of Regents and the State College Board of Trustees, amounting to about \$35 million.
- Tuition will be charged "He" said the economist in both systems for the first time in the State's history. Reagan will ask for 3400 annual tuition on all nine UC campuses in addition to some helps," Nofziger said. \$275 in incidental fees already paid by the students.
- He will ask a \$200 State
- there is enough money on setback for higher education hand from the 1966-67 budget in the State since the Depresto finance two weeks of a sion.' summer session on the Regents of UC, scheduled Berkeley campus.

  to hold their regular meeting

vear — are to be diverted to

A 10 per cent cut from the State General Fund.

Lyn Nofziger, Reagan's bress secretary, insisted that although budget cuts and tuition charges had been discussed, no final decisions had been reached.

were one way of helping to balance the State budget for the next fiscal year.

Every little million

#### SETBACK

Officially, university and college tuition fee, in addi-college administrators would tion to the \$135 in fees, al- say ne more than that "conready paid by students.

No money will be particular the planned summer questions with the Governor's office and continuing" out privately une ranking VC ters at the Berkeley campus official described the combination of budget cuts and tulengeles. It is understood that the continuing of the complex of the

• All special regents, on January 19, were called to funds — the Nuclear American meeting next fund from the Atomic Energy Commission, the "over-als and try to revamp the (Indicate page, name of newspaper, city and state.)

HEREIN IS VALLACTIONED BY SSA 9803 RDD/542

1 L.F.Chronicle

San Francisco, Calif.

Date: 1 - 6 - 67Edition: Final

Author: Carolyn Anspacher

Editor: Chas.de Young

Title: Thieriot

Character:

Classification:

Submitting Office:

Being Investigated

Ronald Reagan-1928

SF

university budget before it goes to the printer un January 15.

The regents have approved a budget request of \$277 million for the next fiscal year, an increase of \$36 million over the current year, to provide for an expected enrollment of about 90,000 on UC dampuses next fall.

The State College trustees have approved \$213 million puses of the university and budget request, an increase the State colleges. of about \$37 million over this year. This was to have provided for about 144,000 students next fall on 18 campuses, including the hiring of 700 additional professors.

UC President Clark Kerr is in the Far East on a consultive assignment and will not return to Berkeley until Sunday. He is expected to confer with Governor Reagan early next week to appeal the proposed budget cuts and tuition charges.

"Reagan apparently intends to replace the 'Creative Society' with an 'Illiterate Society," said Professor Jesse Allen of Los Angeles State College, chairman of the

Statewide Academic Senate which represents all the State college faculties.

He warned that many professors might leave their posts to accept jobs in other states and that the proposed tuition charges will punish students who are "least alle economically."

On the Berkeley campus of the university alone, it is estimated that two-thirds of the students hold full-time or part-time jobs to get through school.

A recent survey at Los Angeles State College showed that 54 per cent of the stadents earn their own living, and 20 per cent of them enrolled at the school because of the low fees.

It is believed that similar statistics prevail on all cam-

## The Crowd Roars for Reagan

Secramento

throughout California yeslute.

When Reagan began his Twenty-five times durin Capital city crowds and speech on the west steps of the 28-minute address th thousands of visitors from the State Capitol a crowd throngs interrupted with terday gave Governor and estimated by police at be- more applause. They rose for Mrs. Reagan a roaring sa- tween 15,000 and 20,000 gave another ovation at the close. a standing ovation.

**Associated Press** 

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### Unruh Wams New Roof for Mrs. Reagan

Sacramento

Assembly Speaker Jesse M. Unruh said yesterday he still hasn't abandoned his campaign to get a new executive mansion for the Governor.

The Inglewood Democrat said he had tried to get approval for new marsion while Edmund G. Brown was Givernor and he would continue the effort for Republican Ronald Reagan.

The present mansion might be considered good enough for the new Republican chief executive, Unruh observed at a community inaugural luncheon.

But Unruh added gallantly, he didn't think the decrepit old building was worthy of Mrs. Reagan

Our Correspondent

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Ronald Reagan-1931

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## Reagan Speech

## **Praise From Both Parties**

Sacramento.

Governor Ronald Reagan's inaugural address was praised yesterday not only by fellow Republicans but by

the two top Democratic lenders in the Legislature.
"I like his approach and his attitude," said Senate
President Pro Tem Huga M.

Burns (Dem-Fresno).

cially pleased with Reason's straightened out immediatedemand that student demon- W. Mulford declared. strators obey the rules of the University of California or get out.

good."

#### UNRUH

M. Unruh (Dem-Inglewood) of truth arrives later when praised Reagan for deliver-Governor Reagan presents ing "a very forward-looking his budget. Then we will speech" and pledged the Legislature's "cooperation, suggestions istic." understanding, and prayers."

Assembly Republican Can cus Chairman Don Mulford fan excellent speech." (Rep-Piedmont) praised Rea- refreel we are going to gan for "one of the most cou- work with the Governor in rageous, forthright messages ever delivered by a chief executive of California."

Mulford said he saw the inaugural address as a stern message to President Clark tion came from Senator Mer-Kerr of the University of Cal- vyn M. Dymally (Dem Los if**e**rnia.

This serves notice to Clark Kerr that there is going to be new day in the conduct of affairs at the university, and <del>I belie</del>ve the Governor spoke for the majority of the legislators that

Burns said he was spe the university is to be

#### NOBILITY

enator J. Eugene McAr (Dem-San Francisco) The speech was some said, "It (the speech) ex-weat idealistic," Burns added "but in the main it was presses great nobility of purpose, sketches a few goals but does not include the details needed to clearly assess Assembly Speaker Jesse his programs. The moment know whether his talk of avoiding new taxes was real-

> Assembly Speaker Pro Tem Carlos Bee (Dem-Hayward) said Reagan gave

the coming months to try to improve the situation here in California," Bee declared.

#### SKEPTICAL

The most skeptical reac-Angeles), who represents the Negro district of Watts.

"I doubt very seriously the Governor's statement that one half of the unemployed in the former curfew area of my Senate district were em-

ployed by private employers (since the 1965 riots) . . .

"I agree the private sector must be involved (in solving the problem of Watts) but to relegate the sole responsibility to them would be doing a tremendous dis-service to the people of this State."

#### 'BABY TALK'

Assemblyman Charles Warren (Dem-LA.), the State Democratic chairman, twitted Reagan for indulging in "baby talk."

Warren said, "It is easy for all of us to recognize the need to deal with the problems of crime, cost of welfare, farm labor and tax reform, as Governor Reagan did in his speech.

"But merely because such problems are easy to recognize does not mean, as he suggests, that their solutions are simple or can be easily developed. This is baby talk."

Our Correspondent:

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# Reagan Reveals State Aides to Serve Counties

#### Sacramento

Governor Ronald Reagan pledged closer state-county relationships during his term in office yesterday at a community luncheon attended by 1000 local civic dignitaries.

"We already have plans,"
Heagan said, "to appoint personnel at the State level
whose only function will be
alson between local communities and the State,

"It does us no good I we complain a bout imposition from above (the Federal level) and we commit the same sin with regard to local government."

Congratulatory wires sent by former Vice President Richard Nixon, Michigan Governor George Romney and former President Dwight D. Eisenhower also were read at the luncheon.

Associated Press

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# Viet Battle Flag at Inaugural

#### Sacramento

A small California State flag which soldiers from California carried into battle in Vietnam flew above the Capitol yesterday while Governor Ronald Reagan delivered his inaugural address,

Sergeant Robert Howell of Lekeport, seriously wounded, brought the flag back.

'I thought we would be proud to have it fly over the Capitol today," Reagan said inconcluding his speech.

"It might remind us of the need to give our sons and daughters a cause to believe in and banners to follow.

"If this is dream, it is a good dream, worthy of our generation and worth passing on to the next."

Los Angeles Times

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# College Cutback

By James Benet

A clear decision that the State's finances regular charges.

Custing the growth rate of But to add large and acCalifornia public higher knowledged tuition fees edication appeared to une means to break finally with de lie the Beagan administrate long-standing State policy tration's budget disclosures that higher education is proyesterday.

changes will be if the Legislature approves the years. Governor's budget program.

sion.

#### **TUITION**

were already asking yes terday, if students discour aged from going to the Uni taxes and only one-third by number of places. the State?

And hasn't Governor Rea- and on what basis? gan promised to reduce, in- The proposed cuts also stead of increase, the prop-remove money with which to

ple of the State wish to had extensive discussion change the fundamental bas- over several years. It was at is of admitting youngsters to the persistent urging of the public colleges and uni-legislators seeking greater versities.

pay substantially and - al- the campuses could educate though the current discussion many more without adding ignores this-the incidental new and expensive buildings.

fees they pay are regarded by many educators as containing concealed tuition

vided free for any student But the disclosures scarce—who can meet admission re-ly hinted at how profound the quirements and find means who can meet admission re-

Moreover, cutting college Nor did they explain some and university budgets by apparent inconsistencies that per cent would seem to force are certain to attract at the ultimate abandonment of tention in the legistative ses- another closely related policy — that meeting the public and objective admissions re-

For instance, educators quirements guarantees a student admission.

The budgets that are being versity of California or the cut were constructed to pro-State colleges by new tuition vide space for the numbers fees, won't many of them so of students who can reato the junior colleges? And sonably be expected to meet won't this be a new burden the admissions requirements on the property tax payer, next fall, If 10 per cent is cut since junior colleges are sup it would scarcely seem posported two-thirds by local sible to provide the same

Who is to be turned away.

Ty tax payer's load? Start the university on A deeper consideration, year-round operations, and however, is whether the peo-this, on the other hand, has economy in higher education.

If students could attend in Of course students already summer, too, they argued. (Indicate page, name of newspaper, city and state.)

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Some students might take winter vacations, others attend all the time, and so on. But it would be a saving.

Over the reluctance of many faculty and the outright opposition of many more, the university has shifted to a four-quarter ed ucational calendar year-round accommodate operation. Some of the State colleges are now on the quar- plans for the orderly growth ter system, and the others have promised to change TO AND A over, too.

Now the Reagan administration says it will cut out the money to staff the first big summer operation, planned to begin at Berkeley this year.

Evidently for the sake of this immediate saving it f villing to forego the long ange saving, which was nce estimated to be worth & whole new campus over 🗈 ten-year period.

The proposed cut will undoubtedly encourage those State college faculty - for instance, at San Francisco State College — who are still bitterly opposed to changing to the quarter system. It may be doubted, however, that this is what the new administration intended.

Another major policy implication which has been Los Angeles. little discussed is the effect on the Master Plan for Higher Education which the Legislature passed almost unanimously in 1960, and the through Coordinating Council which administration proposals, a the plan established.

the council then to "develop have begun.

of public higher education."

It has done so. And responding to the State's huge population growth, the rising birth rate, the greater public interest in education and other factors, since 1958 the University of California has doubled in size, the State colleges have tripled and the public junior colleges have somewhat more than doubled.

But the budgets for which massive 10 per cent cuts are now proposed are budgets which the Coordinating Council has approved and recommended to the Governor and the Legislature.

Do the cuts mean that the administration wants no more of the Master Plan, and no more of the council? These are questions which council members will be asking today at their meeting in

Whatever the detailed answers may be, there appears to be no question that if the Legislatures carries the Reagan brand new era in California's The Lagislature directed public higher education will

## San Francisco Chronicle

Charles de Young Thieriot, Editor and Publisher George T. Cameron, Publisher 1925 to 1955 Founded 1865 by Charles and M. H. de Young

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#### Editorials

## Golden State's

## Inaugural Week

IF THE ARRANGEMENTS for Inauguration Week at Sacramento proceeded from calculations by Governor-elect Ronald Reagan and his advisers upon how to obtain ■ maximum of attention, Statewide and Nationwide, from mea to shining sea, the week's events must be pronounced ■ considerable success.

Never before in the history of the Golden State have many millions been exposed to so much television footage of midnight swearings-in and midday inaugural speeches; early prayers and late balls; formal-dress concerts and high-proof, bonded cocktail parties.

Never have the few paid so much for tickets to participate in these celebrations: up to \$100 a seat for the symphony concert Wednesday night; \$250 a person for last night's cocktail party, and \$50 a couple for the inaugural ball.

It is agreed by political anthropologists at Sacramento that no Governor of California since James Rolph Jr. has attempted to put on a production like the Reagan inaugural. Rolph swept into the Capitol in 1933 at the head of brilliant parade which, in retrospect, seems to surviving witnesses to have the la week, but unfortunately. Rolph's was not a great governorship.

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AMONG NORTHERN CALIFORNIANS who have been merely nonparticipating onlookers at these Southern California Republican triumphs in Sacramento, many will have been confused and bemused by the distinct Hollywood flavor and character of each unfolding event, from the opening oath-taking ("Well, George; here we are on the late show again") to closing prayers ("May we be brought often to our knees to stand tall with Thee in this world ...").

THE NEW GOVERNOR'S inaugural address Reagan's ideas on these heads. was more a statement of his governmental sentiments and philosophy than a program for legislative action.

lems were discussed during the campaign and I see no reason to change the subject now."

Thus the themes of the speech were familiar—the need for legislation to combat "smut and pornography"; the need for tax relief; the desirability of less crime and lawlessness and more self-reliance and self-respect on the welfare rolls; the need for an obey-the-rules-or-leave-the-campus regime in the State college and university systems.

How these thoughts, so manifestly successful in vote-getting, can be expressed in legislation that will appeal to a Democratic Legislature is another matter. We shall all have to wait to hear Governor Reagan's ideas on these heads.



"Squeeze, cut trim—squeeze, cut, trim ...."
Ronald Reagan-1938

#### (Mount Clipping in Space Below)

## Speaks of Reagan

By Lester Kinsolulug Chronicle Correspondent

#### Sagramento

tending an inaugural nor is one of his most regular prayer breakfast yester church goers, when he is in day at Memorial Audito- town. Reagan is actually a day at Memorial Auditorium heard Governor Ronald Reagan described as "a man of piety and prayer" by the Reagan family pastor—whose himself something of a celebrity.

The Rev. Donn Moomaw, pastor of the Bel Air Presbyterian Church, was for three consecutive years an all american linebacker at UCLA.

The Rev. Mr. Moomaw was one of three featured speakers at the breakfast, along with the most Rev. Alden K. Bell, Catholic Bishop of Sacramento, who pinchhit for Los Angeles Archbishop Francis Cardinal McIntyre who has been hospitalized. A third speaker was Rabbi Edgar F. Magnin, of Wilshire Boulevard Temple in Los Angeles, who included among his references to the new Governor a remark "that you may go on to higher posi-

tion, who knows?"
The Rev. Mr. Moomaw mentioned that during the Reagan campaign he had occasionally heard "my sermon illustrations come booming back at me." In response, Reagan acknowledged that "I have stolen some of his material - that's the business I've been in but I intend to confine my stealing to his sermons."

The Governor also de-A Pastor The Governor also described religious tutelage under the pastor, who is I feet 5 inches tall and 225 pounds in terms that "You're afraid not to." He then recalled his own career as a college football player and said that he had never entered m game without first saying a prayer, as was the case, he found, with all his teammates.

The Rev. Mr. Moomaw told Five hundred persons at the Chronicle that the Gover-

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### Reagan's Inauguration

## Splendid Sacramento Ball

By George Draper Chronicle Correspondents Sacramento

Governor and Mrs. Ronald Reagan, together with more than 6000 of their friends, toasted the new Republican era in California with an inaugural ball here last night that rivaled a Hollywood premiere.

The ball had everything - searchlights crisscrossing the sky, beautiful women in way Patrolmen. mink alighting from limousides on the arms of handsome men in tuxedoes.

Reagan and his wife, two receptions before heading for the State Fairwhere the ball was held.

EL DORADO

At least 1500 of the State's Republicans paid \$500 a couple to attend a lavish champagne and hors-d'oeuvres reception at the El Dorado Hotel. It cost \$50 m couple to attend the inaugural ball.

The former actor and his wife were greeted at VIP reception by Jack Benny, who fiddled at Wednesday night's inaugural concert: master of ceremonies Danny Thomas and actor Chuck Connors, who helped with Reagan's campaign.

Mrs. Reagan wore Galan os original gown of white silken wool that left one shoulder bare, and with the shoulder strap sprinkled with

rhinestones.

The Reagans' 14-year-old daughter, Patti, chose a turquoise floor-length gown.

Two orchestras - Freddy | bears were created for Martin's and Manny Har- stage decorations. mon's - played at opposite ends of the enormous building, used during the State Fair to show off agricultural produce like enormous tomatoes and prize squashes.

Four different groups of Pageants. police were on hand to control the crowds that pert who reportedly won his surrounded the building -State Police, Capitol police, Sacramento police and High-

#### MILITARY

There was also lots of gold braid with dozens of military Nancy, stopped briefly at officers in their dress uniforms.

The ball was held in a grounds and the Counties brick building that is a copy Building, a structure the of the California pavilion at length of two football fields, the 1893 Chicago World's Fair. There was 14-foot California seal, and six gold-

"Fiesta California" - al this week's festivities were called - was the creation of Bob Jani president of ■ Los Angeles firm called Pacific

Jani is a special effects exspurs in staging the opening of Disneyland - and his expertise showed.

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Ronald Reagan-1940

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GOVERNOR AND MRS. REAGAN ON THEIR WAY TO THE BALL Champagne, searchlights and ladies in mink Konald Keagan-1941

## State Program

# Alcoholism In Jeopardy

By David Perlman Science Correspondent

California's pioneering programs for the control and treatment of alcoholism are endangered in Sacramento, but a drive is already under way to save them.

Emergency legislation with ■ \$700,000 price tag has been introduced in the Legislature, and Governor Ronald Reagan is being urged by both Republican and Democratic leaders to approve the measure.

In formal report to the governor, State Health Director Lester Breslow said yesterday the new programs. have already succeeded in restoring hundreds of Califormans to health and selfsupport after long bouts with alcoholism.

#### NUMBER

In the next year and a half. Dr. Breslow predicted, the programs can bring "full or partial recovery" to 24,000 alcoholics if clinic and education services are expanded.

And for each one of those patients, the State Health Department noted, California can save thousands of dollars by active treatment services.

The department report on its alcoholism programs described the typical alcoholic introduced a new bill to carin California as a 50-year-old ry the program through the man so drowned in his illness rest of the current fiscal year that he faces an average of 15 years of chronic arrests

COST

In those 15 years, the report said, jails and hospitals will cost the taxpayer nearly 13,000 for each alcoholic. By contrast, • 60-day period of intensive clinic treatment, plus a year of "supportive therapy," would cost the taxpayers \$820 for the same patient - and the patient would have a two-to-ohe chance of improving permanently.

Those who do recover will become self-supporting, will pay their share of taxes, will stay off relief rolls, and will earn an average of \$75,000 during the remainder of their working lives, the report calculated.

California's new focus on alcoholism began in 1965 with passage of a bill under which the State pays 75 per cent of the dost for local community treatment programs. The measure was launched by Senator J. Eugene McAteer (Dem-S.F.) and was financed **\$1.6** million for the fiscal period starting last July 1.

#### **LEGISLATURE**

But the Legislature decreed a short life span for he program, and its appropriations expire March 1. On Wednesday Senator McAteer at a cost of \$700,000.

The bill was supported yesand hospitalization before he terday by former Governor Goodwin J. Ringht, by GOP

State Controller Houston I. Flournoy and Legislative Analyst A. Alan Post. They urged Governor Reagan to approve it so it can be considered as an urgency meas ure right away , without awaiting the governor's formal budget.

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said Governor Ronald Read volve every branch of gov-gan, "has a sorry similarial ernment, including the Govty to the situation of a jet ernor's office ... liner out over the North

would give the bad news beyond our comprehension.

tact; their compass and all just are not easy ones ... wern headed.

"Then he gave the good think of it." news — they had a 100-mile-an-hour tail wind, schedule."

The language in Reagan's inaugural address yesterday was richer and more literary han the words he had exressed spontaneously during he campaign before he won dection two months ago,

But like the campaign presentation, the address did more than outline a program. It carried in it some tion utilizing both public and clues to the philosophy that private resources in a major has guided Reagan through effort to employ the most his career into the governor trol crime.

the largest state in the Union we are going to stop leading during the next three years, in crime. 11 months and 28 days.

duce the cost of sovern. the law-breakers. ment," Reagan said.

"It won't be easy, nor will "Our fiscal situation," it be pleasant, and it will in-

"For many years now, you Atlantic, Paris-bound. and I have been shushed like "The pilot announced he children and told there are had some news — some no simple answers to the good, some bad — and the complex problems which are

"Well, the truth is, there "They had lost radio con- are simple answers - there timeter were not working; The time has come for us to they didn't know their alti-decide whether collectively tude, direction or where they we can afford anything we think of simply because we

"The time has come to run a check to see if all the servand they were ahead of ices government provides mere in answer to demands were just goodies dreamed up for our supposed betterment."

This was Reagan's view of Iaw enforcement and the challenge of crime:

When fiscally feasible, we hope to create a California crime technological founda-

And there were indications explore the idea of a State of how Reagan would face police academy. We lead the problems of governing the Nation in many things;

"Californians should be able to walk our streets safe-"We are going to squeeze abiding are entitled to at and cut and trim until we re-least much protection as

Before the State acts on

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Reagan's proposed program for the future, he suggested immediate legislation to give local communities the right to pass stiffer law enforcement ordinances.

\* \* \*

On courts, on youth and the aged:

I pledge my support and fullest effort to a plan which will remove from politics, once and for all, the appointment of judges...

"Just as we assume a responsibility to guard our joung people up to a certain age from the possible harmful effects of alcohol and to-bacco, and do I believe we have a right and a responsibility to protect them from the even more harmful effects of exposure to smut and pornography...

"We we a humane and generous people and we accept without reservation our obligation to help the aged, disabled and those unfortunates who, through no fault

of their own, must depend on their fellow men. But we are not going to perpetuate poverty by substituting a permanent dole for a pay check."

\* \* \*

Reagan attempted, too, to put his succession to the governorship into perspective.

"What is taking place here is almost common-place routine," he said. "We are participating in the orderly transfer of administrative authority by direction of the people...

"Perhaps you and I have lived with this miracle too long to be properly appreciative. Freedom is a fragile thing and is never more than one generation away from extinction.

"It is not ours by inheritance. It must be fought for and defended constantly by each generation, for it comes only once to a people. Those who have known freedom and than lost it have never known it again."

Our Correspondent
Ronald Reagan-1944

# Reagan Aims at Budget

naugura

Message-

### Fiscal Order

By Earl C. Behrens Political Editor

Sacramento

California will "squeeze, cut and trim" to put its fiscal house in .lutely essential." order, Governor Ronald Reagan declared yesterday in his inaugural atdress.

He proposed u prográm the proposed in program to reduce crime, to reform the welfare program by changing "relief check to pay check," to battle against waste in government and to halt mob lawlessness

"Those with grievance can seek redress in the courts or the Legislature but not in the streets," the 55-year-old governor said in his address on the steps of the State Capitol.

#### TOLERANCE

Lawlessness by the mob, as with the individual, will dollars." He said this would not be tolerated. We will act filmly and quickly to put down riot or insurrection wherever and whenever the situation requires."

He spoke to both houses of the Legislature and to an audience estimated by Sacra-

0,000. The outdoor inauguration, third of its kind in the tate's history, was held in sunshine following an early morning rain.

The temperature was 44 degrees.

Reagan declared his Idministration would strive to provide "those things we need, knowing we can afford them and they are paid for."

#### TAXES

Among them, he said. would be property tax relief "which I believe is abso-

And though there will be stricter controls on welfare. Reagan said. Um State will carry out the sentiments of a humane program in providing aid to those who truly

The new governor declared that "gimmick" financing had been employed by the outgoing Democratic Administration. He did not mention former Governor Edmund G. Brown by name.

The governor said he has "inherited" • financial situation which presents him with possible "deficit in the coming year" of perhaps "three-quarters of a billion be the case if present levels of state spending continue and if the "absolutely essential" property tax relief is given.

#### **PROPERTY**

He said he was preparing mento police at 15,000 to "detailed and comprehensive

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Ronald Reagan 1945

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He did not present any pro- struction Max Rafferty in reposed tax increase program turning more control of curbut he did, in effect, rule out riculum and selection of text- of California's government is any "withholding of personal books to local school districts too high. "It adversly affects income taxes" as a means in and in the out of state reraising State revenue. This cruitment of teachers. was a program of former Governor Brown which was defeated in the legislature.

"stand between the taxpayer tion within framework of and the tax spender." He de-reasonable rules and regulaclared that government "is tions. the people's business and every man, woman and child becomes a shareholder with litical interference with inteller the first penny of tax paid."

He said the entire tax situation is now being studied port the college and universiand reviewed before any tax recommendations will be made.

#### LOCAL

The new Governor in brief proposed to:

 Return to local communities power to pass and enforce police ordinances.

 Remove judicial appointments from politics.

 Support legislation against "smut and pornegraphy.

· Create a California drime technological foundation at a future unspecified time in an effort to employ the most scientific tech niques to control crime.

Explore the idea of creating a state police acade my to train law enforcement officers.

- Reduce administrative overhead in Welfare Administration, cut red tape and return control an much as possible to the county level.
- Support statewide program to reduce unemployment and depend upon private industry, under direction of H. C. McClellan, a volunteer. Lieutenant Governor Robert Finch will be the liaison between government and private industry in the job training and education program.

On education, Reagan

"It is no denial of academ-Reagan declared he would ic freedom to provide educa-

> "It does not constitute nolecture reedom for the paying citizens - who supty systems — to ask that, in addition to teaching, they build character on accepted moral and ethical standards."

Other proposals enunciated

by Reagan included:

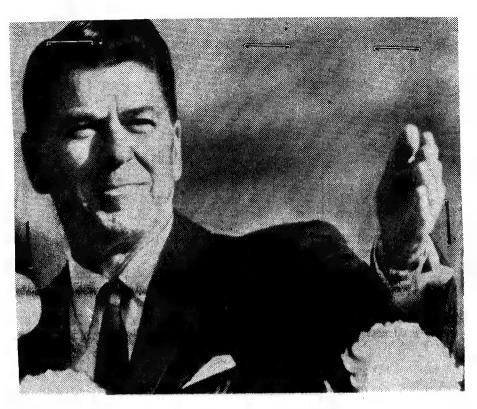
- Tegislation to provide secret ballot in his union on policy matters and the use of union dues.
- A mediation service in labor management disputes not exvered by existing law.
- Improvements in workmen's compensation in death benefits and benefits to permanently disabled.
- Less restrictive controls on Wederal grants and a bigger share of Federal taxes collected in California, along with tax credits for parents sending children to college.
- Federal legislation to "lift the archaic 160-acre water limit.
- Abolition of restirctive labor polices in agriculture.
- Solutions to "unrealistaxes which threaten "conomic ruin" to agriculture.

The governor harshly criticized the Brown administration's change from a cash to an accrual system of bookkeeping. This, he said, ■ Cooperate with State Su- was "financing the 12

program" of property relief. perintendent of Public In-|months' spending with 15 months' income Reagan contended the cos our business climate," h

said.





AP Wirephoto

GOVERNOR RONALD REAGAN

Ten thousand persons saw inaugural in Sacramento sunshine



Mrs. Reagan watched the Governor greet Ivy Baker Priest, California's state treasurer
Rocald Reagan-1947

Director, FBI
ATTENTION: ADMINISTRATIVE DIVISION AND
TRAINING DIVISION
SAC, San Francisco (80-990)

GOVERNOR RONALD REAGAN

Enclosed, herewith, for the Bureau's information are two articles from the "San Francisco Chronicle" 1/6/67 relative to Governor REAGAN's inaugural message. It is noted that to law enforcement:

- 1. Return local communities' power to pass and enforce police ordinances.
- 2. Support legislation against smut and purnography.
- Create a California Crime Technological Foundation at a future unspecified time in an effort to employ the most scientific techniques to control crime.
- 4. Explore the idea of creating a state police academy to train law enforcement officers.

I thought the Bureau might be interested in his inaugural comments.

Ronald Reagan-1948

2 Bureau (Encl.- 2) 1 SF COL:ekk (3) ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-LY-96 BY SSA 92 3 ROOFTAC

hute at soits inquised as it whethe you.

Asil. was advised be would be unavailable

for several neith until be jet his office

mining, + equiatur mothers wanted.

Z

56-1-6-20

450 Golden Gate Avenue, Box 36015 San Francisco, California 94102 January 16, 1967

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-14-96 BY SSAGRAS ROO SAC

Honorable Robert H. Finch Lieutenant Governor State of California Sacramento, California

Dear Mr. Finch:

It was a pleasure to visit with you today. I would be honored if you could visit the San Francisco FBI Office any time you are in San Francisco. I will look forward to seeing you from time to time.

Kindest personal regards.

Sincerely,

CURTIS O. LYNUM Special Agent in Charge

- Addressee - SF 80-990 COL:hko

Ronald Reagan-1949

H

50-910-21

#### 450 Golden Gate Avenue, Box 36015 San Francisco, California 94102 January 16, 1967

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-14-96 BY SSA 92 3 RAD/JAC

Honorable Ronald Reagan Governor State of California Sacramento, California

Dear Governor Reagan:

It was  $\blacksquare$  pleasure to visit with you today and I want to wish you a speedy recovery from the flu.

I will look forward to seeing you from time to time. Best wishes for your continued success.

Kindest personal regards.

Sincerely yours,

CURTIS O. LYNUM
Special Agent in Charge

- Addressee O- SF 80-990 COL:hko

Ronald Reagan-1950

chh

80-190-22

CODE

TELETYPE

URGENT

ALL INFORMATION CONTAINSO

HEREIN IS UNCOMPRIED DATE 3-14-96 BY SSATBOSROOTAL

TO: DIRECTOR (100-151646)

FROM:

SAN FRANCISCO (100-34204)

UNIVERSITY OF CALIFORNIA, BERKELEY, CALIFORNIA (UCB), INFORMA-TION CONCERNING.

REMYTELEPHONE CALL TO BUREAU JANUARY FOURTEEN LAST.

AS AUTHORIZED BY BUREAU, SAC AND SECURITY SUPERVISOR CONTACTED GOVERNOR RONALD REAGAN AND LT. GOVERNOR ROBERT H. FINCH TODAY. THEY WERE ADVISED THAT THE DIRECTOR REQUESTED THAT PERSONAL CONTACT BE MADE WITH THEM TO DETERMINE SPECIFICALLY WHAT INFORMATION WAS DESIRED. FURTHER THE DIRECTOR WANTED ASSURANCE THAT ANY INFORMATION FURNISHED TO THE GOVERNOR WOULD BE HELD IN STRICT CONFIDENCE AND KNOWN ONLY TO THE TWO OF THEM. GOVERNOR REAGAN AND LT. GOVERNOR FINCH BOTH AGREED WHOLEHEARTEDLY TO THIS STIPULATION.

THEY ARE CONCERNED OVER THE SITUATION AT UC, PARTICULARLY ON THE BERKELEY CAMPUS.

GOVERNOR REAGAN SPECIFICALLY REQUESTED ANY INFORMATION ON UNIVERSITY PRESIDENT CLARK KERR, ANY SUBVERSIVE INFORMATION ON ANY OF THE UNIVERSITY REGENTS AND ANY INFORMATION THE FBI DEVELOPED INDICATING A DEMONSTRATION WAS TO BE HELD ON THE CAMPUS OR AT PRESS CONFERENCES. HE INDICATED THAT IT IS

/- 80-990 (Gov. REAGAN)

Ronald Reagan-1951

Estech 240 1/4

SF 100-34204 PAGE TWO

PROBABLE THAT SOME OF HIS PRESS CONFERENCES COULD BE STACKED WITH "LEFT WINGERS" WHO MIGHT MAKE AN ATTEMPT TO EMBARRASS HIM AND THE STATE GOVERNMENT.

HIS ATTENTION WAS DIRECTED TO THE THIRTEENTH CALIFORNIA STATE SENATE UNAMERICAN ACTIVITIES REPORT, AND IT WAS POINTED OUT TO HIM THAT THE STATE SENATE HAD CONDUCTED EXTENSIVE IN-VESTIGATIONS INTO SUBVERSIVE ACTIVITIES IN AND ABOUT THE UC CAMPUS. HE WAS ADVISED THAT THE FBI HAS NOT INVESTIGATED UC ALTHOUGH WE HAVE INVESTIGATED SOME INDIVIDUAL SUBVERSIVES WHO MAY HAVE HAD A CONNECTION WITH THE UNIVERSITY.

GOVERNOR REAGAN STATED THAT HE WAS "DAMNED MAD" AT CLARK KERR, PRESIDENT OF UC, AND GLENN DUMKE, PRESIDENT OF THE CALIFORNIA STATE COLLEGES, FOR THEIR STATEMENTS LAST WEEK REGARDING THE CURTAILMENT OF ENROLLMENT AT THE COLLEGES IN VIEW OF THE CRITICAL FINANCIAL DEFICIT IN THE STATE.

GOVERNOR REAGAN ANNOUNCED LAST WEEK THAT THE POSSIBILITY MIGHT EXIST THAT A CHARGE WILL BE MADE FOR TUITION FOR STUDENTS FROM CALIFORNIA IN THE AMOUNT OF FOUR HUNDRED DOLLARS PER YEAR. THIS HAS TOUCHED OFF STATEWIDE CONTROVERSY ON WHETHER OR NOT TUITION SHOULD BE CHARGED AT THE TRADITIONALLY FREE COLLEGES AND STATE UNIVERSITIES.

GOVERNOR REAGAN IS AFRAID THAT SUBVERSIVE AND LEFT WING

SF 100-34204 PAGE THREE

ELEMENTS WILL ATTEMPT TO MISCONSTRUE THIS PROPOSAL OF FISCAL RESPONSIBILITY, AND IT IS FOR THIS REASON HE DESIRES ANY INFORMATION CONCERNING ANY DEMONSTRATIONS AGAINST HIM OR THE UNIVERSITY ADMINISTRATIONS.

PERMISSION IS REQUESTED TO FURNISH GOVERNOR REAGAN ON A CONFIDENTIAL BASIS ANY PUBLIC SOURCE INFORMATION, LEAD INFORMATION OR GENERAL INFORMATION CONCERNING SUBVERSIVE AFFILIATIONS OF ANY DEMONSTRATORS THAT COME TO THE ATTENTION OF THIS OFFICE WHO PLAN DEMONSTRATIONS AGAINST THE POLICIES OF THE REAGAN ADMINISTRATION, PARTICULARLY THOSE POLICIES HAVING TO DO WITH UC AND THE STATE COLLEGES. THIS WOULD BE MADE AVAILABLE TO THE GOVERNOR ON A HIGHLY CONFIDENTIAL BASIS.

GOVERNOR REAGAN'S APPOINTMENT WITH CLARK KERR, SCHEDULED FOR TODAY, WAS CANCELLED DUE TO THE FACT THAT GOVERNOR REAGAN HAS THE FLU AND IS CONFINED TO BED. CONTACT WITH GOVERNOR REAGAN TODAY WAS MADE AT THE EXECUTIVE MANSION PER HIS REQUEST, EVEN THOUGH HE WAS CONFINED TO BED.

IT SHOULD BE NOTED THAT BOTH THE GOVERNOR AND LT. GOVERNOR EXPRESSED THEIR ADMIRATION FOR THE DIRECTOR AND THE WORK OF THE FBI.

END.

#### (Mount Clipping in Space Below)

# Office Equipment

# Another Reagan Economy Freeze --- Purchasing

By Earl C. Behrens Political Editor

Sacramento

Governor Ronald Reagan yesterday ordered more belt tightening on the part of State departments and agencies in his "iron hand" efforts to cut State spending.

The Governor also refused to retreat from his announced position of favoring an average cut of 10

per cent in the operating costs of al departments of State government, including the University of California and the State Colleges.

But he made it clear that talks are continuing with the university regents. Représentatives of the State college have discussed their budget requests with State Finance Director Gordon P. Smith.

The newest "freeze" ordered by the Governor was on the purchase of additional! office equipment "for an indefinite period." He has already closed off hiring of, mpre State employees, extil a survey may be made. He also has put an embargo his department. on out-of state traveling by en attention.

equipment could result in the savings of large sums.; It does not, however, affect orders already placed under budget allowances of the Brown administration. It also is expected to turn up much 'surplus' equipment which can be made available to other departments.

Department heads wanting equipment will be required to clear their requests through Dirk C. Eldredge, assistant executive secretary to the Governor.

Assistant press secretary Paul Beck explained yesterday that the "feeze" on ergployment does not affect the California Highway Patrol cept in emergency cases, un- since the Legislature had authorized enlargement of

The Governor also has in-·State officials and employees structed department heads. until that subject may be giv- especially the new ones, to stick to their jobs rather The new order on office than accepting the flood of

speaking in vitations. He wants them to keep a firm hand on their agencies during this formulative period of his administration.

Announcement was made that the new Governor will a three-minute "weekly report" to the people on television every Monday night, beginning this Monday. The reports will be limited to a single subject and distributed to every television station in the state, presumably to be included in news programs. It was announced that the costs of the reports will not be borne by the State.

(San Francisco's television stations were not certain yesterday when they would carry the Governor's report.)

(Indicate page, name of newspaper, city and state.)

ALL INFORMATION CONTAINS HEREIN IS UNCLASSIFIED SA980 3280 STACED DATE 3-14-96 BY SSA980 3280 STACED S.F.Chronicle

<u>San Francisco, Calif.</u>

116-57309+

1-14-67 Date: Final Home Edition:

Author: Earl C.Behrens Chas.deYoung

University of calif., BERKELEY, CALIF.

INFORMATION CON-CERNING

Classification SF 100-34204

Submitting Office: SF Bufile 100-151641

Being Investigated

SEARCHED FBI - SAIN FRANCISCO Ronald Reagan-1954

80-990124

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### Friendly Letter

# **Brown Gives** Gov. Reagan Some Tips

Former Governor Edmund G. Brown has written the following letter to his successor, Governor Ronald Reagan.

Honorable Ronald Reagan Governor's Mansion Sacramento, California Dear Governor:

There's a passage in "War and Peace" that every new Governor with a big majority should tack on his office wall. In it young Count Rostov, after weeks as the toast of elegant farewell parties, gallops off on his first cavalry charge and then finds real bullets nonsense from a fiancee

snapping at his ears.

me," he says. "Me, whom even a friendly publisher's everyone loves."

to you in the next four years. Learn to live with that, the back in government conrost is easy.

As you must have noticed by now, the press fires the first real bullets at new governors. And the hardest lesernors. And the hardest iespublishers which reads: son to learn is that it is futile "Thank you for your sincefe" to fire back. Never get into an erconvent with a newspaper unless you own it. A newspaper fails to get in the last word only if it goes bioke in mid-debate.

Publishers in California generally will be more toler-

whose father is rich. But you "Why, they're shooting at will be amazed at how early tolerance is strained by trivi-Nothing worse will happen al matters — I freeway route through his backyard; I rollstruction in his city; failure to follow his advice on the appointment of a judge.

I recommend form letter for all disagreements with interest in the matter of . . This provides little in the way of ammunition for a new ttack.

THERE IS also not much I I can tell you about the ant of governor before he weekly news conference that raises taxes, much as a you haven't aircany learned. young man will take more You will find that while both (Indicate page, name of newspaper, city and state.)

SECTION TO THE PROPERTY OF THE DATE 3-14-96 SSA9800 200 /74C

1 S.F.Chronicle

San Francisco, Calif.

Date:

2-27-67 Final Home

Edition: Author:

Edmund G.Brown

Chas.deYoung Editor: Thieriot Title:

Character:

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Classification:

Submitting Office:

SF

Being Investigated

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cc to Sureau, by letter 2-27-67

Ronald Reagan-1955

surgeons and reporters operate with professional detachment there is only one real difference between them. Surgeons make more money for cutting you up.

But their motives are the same - to make sure everything is running properly. And in the case of the press, ers, news conferences are as close to a first-hand accountminute television spots.

Invest as much time preparing for these inquisitions seyou can spare, but don't IN ONE of his novels, C. P. feel bad if you are caught Snow writes that the dif-😆 you can spare, but don't ready answer for that, I locked dooors. didn't.

the other hand, am holding just two answers to any quesnews conferences less, enjoy- tion and his chances of being ing them more, and find my-right are as good as the next self in complete agreement man's - 50-50. On the other with the philosophers.)

NE LAST word about dealing with reporters. If you don't want it in the papers, don't do it. There is nd such thing as a secret in State government.

In the first place, gossip, rumor and inside-information conference is the same — the tion for indecision. But in the are the nickels, dimes and dollars of life in government. It's not money that determines man's place in the close them without actually ing. government sun; it's what he resorting to physical vioknows that nobody else does. lence.

would rather miss every that "taxes should hurt." news conderence in wear than miss single secret months, your career budget meeting. Finally, there is almost are bound to persuade ways someone at any meet but that California governing, secret or otherwise, who meet loses some 360 Brillion thinks you have it all wrong a year in taxes because ours urban California and the they operate with proxy and believes the best way to is one of the few states in the straighten you out is to tell nation that doesn't withhold chances are you will find: all to newsmen.

it rue unless public-relations the story yourself. That way frms prepare live two at least, you are sure to gel in new revenue. Over a your version into print first.

off-guard. I can still hear a ference between success and voice from the back of the failure in politics lies in room asking: "Governor, do knowing which doors to push. you think lobbyists should be knowing which doors to push. The successful politician required to wear little green nusbes only on which buttons on their lapels?" pushes only on unlocked Maybe you would have a doors; the failure pushes on

You should keep as many  $Harrowing \blacksquare they are, doors - or options - un$ news conferences do provide locked as possible - keep chance for correspondents open as many alternative apto bore in, a practice that proaches to problems as you philosophers find a healthy can. With any luck, of thing for the democratic course, a Governor — like evprocess. Few governors take ryone else — eventually any comfort in that. (I, on domes to a choice between hand, if you read your mail regularly you will find an enormous bloc of Californians who build a surprisingly better score, just by guessing, than the Governor can with all of the facts at hand.

evasive; the press trying to vice make the risk worth tak-

of that inside information, an option. You are ideologi- ample. I think you correctly who's to know he has it? cally opposed to withholding read your November majori-Then, too, most reporters income taxes on the ground ty as a mandate to cut gov-

> income taxes. Now, it takes a ming" to produce \$60 million badger the youngsters day period of time you may well decide — as I did that withholding income tax where there's no tuition, and is the only way to guarantee that all taxpayers pay their fair share — that many leave the state owing some \$60 million that must be absorbed by the rest of us.

> But you have already closed a door here by declaring flatly that you oppose withholding. Of course, you could simply announce some day that you have thought it. over and decided that a paid monthly hurts 12 But the surest way to get as much as a tax paid in the other side of any question nually. That's rather including whether the earth etched, of course, but at a really round) is to spend a east it would restore of time with the Legis aption for action. After all ture. And bear in mind that even Bart Starr has use if you can't beat the Legisla-audible signals now and men, ture you are in bad way, change in the few seconds it either. takes to get from the huddle in Sacramento. 4.0.5

ON'T SPEND too much time talking with people who agree with you - you already know what they In the matter of these op-think. Of course, if you listen tions the script of every news to all sides you risk a reputa-Governor trying to keep the long run, the advantages of doors open without being searching out contrary ad-

The current controversy over the state colleges and And unless he spends a little Let's take an example of the university is a prime ex-

ernment costs as much www Over a period of weeks or possible, but I don't think the madate extended to imposing tuition.

Knock on any door in sub-(1) the property taxes are ing of what happened to their a There's only one way to monumental amount of too high, (2) the parents of the p and night about good grades -good enough to qualify for the University of California (3) paying tuition would more than wipe out any cut in property taxes. As a matter of fact, the added burden on junior colleges that tuition would mean would probably force an increase in property

LISTENING to the other side won't quarantee the right decision, but it raises the odds in your favor.

because verything can because you can't join 'em,

Even as fundamental a to scrimmage. It's the same question as whether to counsel with key members of the Senate and Assembly before you submit proposals for new law has potential for disaster.

> Many people feel governor should do so. After all, they argue, the Legislature decides whether governor's program lives or dies.

> Suppose you want to raise penalties for armed robbery. You call in a great of key legislators, and start to write



■ bill everyone can live with. One is with you all the way, no matter what the facts. Another is against you on the same basis. "Tougher penalties means more prisons. We can't afford them."

"We can afford them." says the next man, "but the money would do more good if parole, not more prisons." There is bound to be me man who thinks juries will be less likely to convict if the penal ty is too high.

Finally, an old-timer in the group will say he's heard all this before; there's mo chance for agreement; and the matter needs two years of hard study by an interim committee.

bill.

Of course, you can always go ahead and submit the bill. even after a conference like that - but, believe me, hell hath no fury like a key legislator scorned. If you agree to water down the bill or make it even stronger during the cofference, then it is no longer your bill. Besides, if it's a program with merit, the public is entitled to hear all of the arguments on both sides and that can happen only on the floor of the Legislature.

work on lot of legislation.

TAKE A speed-reading done it already. The memoranda with the good ideas from a distance and you have to read them all to find the right ones. There are no ertment, as you will discover. Reading all of the paper that goes across your desk is depressing. Reading it slowly is doubly depressing. You'll find two briefcases essential (three, if you don't stuff anything in your pockets or confiscate half the space in your travel secretary's briefcase).

You will be amazed, too, at how much time you will save in meetings if you read all presumed by most voters in bureaucrat like having a meeting start out with that you are favorite-son we use it on more effective summation of the half-hour candidate for the presidency report he is about to deliver.

There is a serious side to this, too. You will find the 100.000 state employees as dedicated to their work as any people you have met. They are the most able state you can with that posture. workers in the country. They will provide you with the best-documented recommen dations you have ever But the final decision is And that's the end of your yours. And the more fine print you have read, the bet- money that financed the dister the decision you will covery of atomic energy; make.

> On the other hand, you should try to stay out of Federal Government, nome of the controversies wouldn't have Everett Dirkthat people will try to force sen's Gallant Men (record alon you. The fights over highway routes mm especially devastating. The ground rules for selecting highway rules for selecting highway found it comfortable and routes are clearly set out and they had put in the new free none of them bevolves the way along 30th street and the governor.

every other field of government, the governor is the Finally, if it's any consola- court of last resort. And you generally quiet, and the metion, neither approach will will seldom turn away a protest delegation with the argument that the constitution gives the Highway Commission sole authority to fix course, if you haven't routes and that you lost any real influence over the commissioners the day you aplook just like the rest of them pointed them, because you too fast for you to get a good can't fire them.

Generally, all the delegation wants is sympathetic that is one of the genuine that many good ideas in government, wrich seems harm-satisfactions of being Goverless enough. Then, again, aft-nor of this State — soaling er you have listened sym- over the cities and towns; the pathetically, they will leave farms, the dams and canals; the office convinced that their overwhelming mass of evidence and logic has swayed you to their side. And you won't hear from them again until the commission's decision goes against them.

THERE IS one other area in which you can't win. you are now in office and are the memoranda before they the best American tradition begin. Nothing slows down a to be thinking one thing and saying another. And so when you announce in all candor solely because it is good way to avoid a party fight. don't expect anyone to be listening. You will be a candidate for President and you will just have to do the best

> Finally, don't fight the Federal Government too hard. After all, Lewis and Clark were on the Federal payroll when they discovered Oregon; it was Federal and man is exploring space. on tax-supported rockets. After all, if it weren't for the bum)."

I'm sorry you are leaving the mansion. You would have trucks no longer were shift-But in highways, as in ing gears outside the bedroom. The guests at the motels around the mansion were chanics at the used-foreign car lot across the street didn't start running up the engines until respectable hour.

Also, I am sorry you are selling the Grizzly. A chartered jet flies too high and look at this great, golden State as you fly over. And the colleges; the National Guard fighters on fiveminute alert; the highways; all the things that make California the leader among equals in this Nation.

Its people are sometimes

unpredictable. Its challenges are not. You can count on their always being there.

And to govern it, you need only keep in mind Satchel Paige's wise words: Never look back.

> Cordially, (Signed) Edmund G. Pat Brown Times-Post Service



EDMUND G. BROWN Dear Governor



Police Chief Sal P. Jimno, a member of the Governor's Law Enforcement Advisory Committee, recently attended a meeting of the panel in Sacramento and is shown here shaking hands with Gov. Ronald Reagan. San Francisco Police Chief Thomas Cahill is in the center. Chief

Jimno reports the committee discussed immediate problems confronting enforcement agencies and requested the governor to back any legislation that would strengthen the role of law enforcement in California.

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Ronald Reagan-1958

#### State of California GOVERNOR'S OFFICE SACRAMENTO 95814



February 27, 1967

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED SCA 9803RD D/JAC
DATE 3-14-96 BY SSA 9803RD D/JAC

Mr. J. Edgar Hoover
Director
Federal Bureau of Investigation
United States Department of Justice
Washington, 25, D.C.

Dear Mr. Hoover:

It has recently come to my attention that the F.B.I. will soon open a Division Headquarters in Sacramento having jurisdiction over the newly established Federal Eastern Judicial District. This is gratifying as this will more ably assist all of us in our continuing fight against crime and subversion.

As I study the large area covered by the Eastern District, I am favorably impressed with the wisdom of your decision in this matter. I am vitally interested in doing everything I can to combat the moral decay as shown by our rising crime rate in our country today. Having always had the highest regard for you personally and the splendid record the F.B.I. has achieved, please accept my personal assurance that your agency will have the most complete cooperation possible from my office.

I am looking forward to meeting the new agent in charge for your Sacramento Division in the near future, and if my office can be of any assistance whatsoever, do not hesitate to call on me personally.

Sincerely,

Ronald Reagan-1959

Ronald

RONALD REAGAN
GOVERNOT SERIALIZED

INDEXED ....

MAR <sup>1</sup> 8 1957

FBI - SAN FRANCISCO

P.S. L've fuit always feet better lenowing your han a

89-949-65

#### March 7, 1967

Honorable Fonald Reagan The Governor of California Sacramento, California 95814

My dear Governor Reagan:

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-14-96 BY SSA9863RD DAC

Your most thoughtful letter was received on March 6th and, on behalf of all my associates, I want to thank you for your personal assurances of complete cooperation in the fight against crime and subversion.

I have instructed my representatives to extend all possible assistance to local and state agencies in California in matters of mutual interest, and I do hope you will not hesitate to call upon us whenever we can be of service. I share your confidence that a great deal can be accomplished by working together.

favorable, we plan to open our Excramento Office in early summer. After space problems are resolved, I will name a staff and have the new Special Agent in Charge get in touch with you at his earliest opportunity. You may be sure that all of us in the FEI look forward to working with you and your administration.

With warmest personal regards.

Sincerely yours, L Edgar Hoover

Ronald Reagan-1960

Los Angeles - Enclosure
San Francisco - Enclosure
- San Diego - Enclosure

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SEARCHED INDEXED
SERIALIZED FILED

IMAR 8 1957

FBI - SAN FRANCISCO

20-999-66

OPTIONAL FORM NO. 10
MAY EDITION
GSA FPMR (41 CFR) 101-11.6 UNITED STATES GOVERNMENT

# *lemorandum*

TO

SAC (80-990)

DATE:

4/19/67

FROM:

ASAC MORELAND

ALL INFORMATION CONTAINED

HEREIN IS UNCLASSIFIED DATE 3-14-96 BY 55A9203RD DATE

SUBJECT:

GOVERNOR REAGAN

On 4/17/67, ASAC and SRA PETER T. SEXTON, Sacramento, visited briefly with the Governor and his Clemency Secretary, ED MEASE. The Governor indicated that he was aware that we were going to open an office in Sacramento since he had had some correspondence with the Director. He indicated that he is a little concerned as to what the Supreme Court is doing (apparently to him) since they are not taking any action on pleas for clemency or reviews by the Supreme Court from prisoners condemned to die in San Quentin. ED MEASE privately noted that Justice Douglas formerly acted on these matters by himself; however, now he is not taking any action except referring them to the full court.

The Governor expressed his high regard for the Director and the Bureau, and wanted this conveyed to Mr. HOOVER, which will be done when I see him during the coming week.

ACTION: File.

JTM:1mm (1)

Ronald Reagan-1961

INDEXED SEARCHED. SERIALIZED A FILED APR1 9 1967 FBI - SAN FRANCISCO



450 Golden Gate Avenue, Box 36015 San Francisco, California 94102 May 23, 1967

> ALL INFORMATION CONTAINSO HEREIN IS UNCLASSIFIED DATE 3-14-96 BY 35A 9003 RAD STA

Mr. Philip Battaglia Executive Secretary Governor's Office Sacramento, California

Dear Phil:

I know the Governor is interested in the Young American Medal Awards project. Enclosed is a clipping which may be of interest to him in connection with this project.

It was nice to visit with you on your recent trip to San Francisco.

I hope the newspaper I gave you was of some assistance.

Best wishes and kindest regards.

Sincerely.

CURTIS O. LYNUM Special Agent in Charge

Endoeme (Dec 80-463-34)

Eln c-1 deddinessee 1 - SF 80-990 1 - SF 80-463

COL:hko (3)

Ronald Reagan-1962

50-990-30

Reagan for More Police **Protection** 

SACRAMENTO (AP) Gev. Reagan told California law enforcement representatives yesterday that he'll keep seeking new laws to protect, the officers while they're on duty.

' I think some justice should be done for those who uphold the law" well as those accused of violating it, he told the convention of the California Peace Officers Association.

"We shall continue to sign into law everything we can to protect the officer," he said. Reagan also said he doesn't

believe society in responsible

for crime.

"I believe the individual is responsible for crime and the criminal must stand trial and be punished."

He repeated his firm approval of the death penalty, adding that he understands the accurate translation of the Old Testament is not "thou shalt not kill," but "thou shalt not murder

HEREIT IS THE ASSETTED SA 9803 LDS FAC DATE 3-14-96 BY SSA 9803 LDS FAC

<u> </u>
(Indicate page, name of newspaper, city and state.)
,
-
2 Oakland Tribune
Oakland, Calif.
Date: 5-24-67
Edition
Author: Final
Editor:
Title: Wm.F.Knowland
Character:
or
Classification:
Submitting Office:
SF Being Investigated



Ronald Reagan-1963

UNITED STATES GOVERNMENT

# $\it Aemorandum$

: FILE (80-990)

DATE: 6/7/67

FROM : SAC LYNUM

SUBJECT: GOVERNOR REAGAN

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED SA 9803 RODITAL

This is to record that on 5/23/67, while attending the CPOA at Sacramento, I had a brief visit with the Governor. He made an excellent speech before the CPOA and his forthright comments brought him a standing ovation from nearly 1,000 Peace Officers and their wives who were in attendance.

ACTION: File

COL:ekk (1)

Ronald Reagan-1964

SEARCHED \_\_\_\_INDEXED \_\_\_\_ SERIALIZED \_\_\_\_FILED \_\_\_\_ JUN 71967 FBI - SAN FRANCISCO

450 Golden Gate Avenue
Box 36015
San Francisco, California 94102
June 22, 1967

ALL INFORMATION COMPANIES
HEREIN IS UNCLASSIFIED
DATE 3-14-96 BY 55A9B03RDD JOAC

Honorable Ronald Reagan Governor of California Sacramento, California

Dear Governor Reagan:

In view of your prior comments to me concerning J. Edgar Hoover and his lifelong outstanding work as Director of the FBI, I thought you might be interested in the fact that he will celebrate his Fiftieth Anniversary as a member of the U. S. Department of Justice on July 26, 1967. Mr. Hoover has been Director of the FBI since May 10, 1924. The thought occurred to me that you may desire to issue a proclamation proclaiming July 26, 1967, as J. Edgar Hoover Day in California. Enclosed is biographical material which may be of interest to you.

It was a pleasure to hear your speech at the California Peace Officers' annual meeting in Sacramento on May 23, 1967, and also to read about your comments at the national Sheriffs' area meeting at Las Vegas. Your forth-right comments were well received as evidenced by the standing ovation.

Best wishes and kindest personal regards.

Sincerely,

CURTIS O. LYNUM
Special Agent in Charge

Enclosure
l addressee
T SF (80-990)
COL:ekk
(2)

Ronald Reagan-1965

50-90-3



### State of California

GOVERNOR'S OFFIC SACRAMENTO 95814

July 3, 1967

Mr. Curtis O. Lynum 644 West Hillsdale Boulevard San Mateo, California 94403 HEROIN IS DINCTO SEA 9803 (200) TAKE

DATE 3-14-16 by 55A 9803 (200) TAKE

Dear Curt:

Thank you for your thoughtful letter of June 29, 1967 and your kind offer of continued assistance to the Governor and myself.

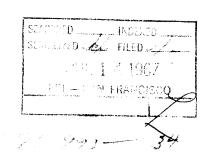
Our association with you during the past few months has been very enjoyable, and I am pleased that we can feel free to call on you in the future.

Best wishes for many happy years of retirement life.

sincerely,

Philip M. Battaglia Executive Assistant to the Governor

Ronald Reagan-1966



UNITED STATES GOVERNMENT

# Memorandum

TO : FILE

DATE: 7/25/67

FROM · SAC BATES

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-14-96 BY 55498.3 RDD JOAC

SUBJECT: RESOLUTION BY THE CALIFORNIA ASSEMBLY

COMMENDING THE DIRECTOR ON HIS 50TH ANNIVERSARY

In a follow-up to telephone call by ASAC MORELAND to TOM BISHOP at the Bureau regarding the resolution introduced in the California Assembly today and the fact that Governor REAGAN might possibly call the Director, I checked further with SRA MALONE in Sacramento. He advised that this Resolution was authored by Assemblyman DON MULFORD of Oakland was adopted unanimously by the Assembly. It will be printed in the official record tonight and copies will be available tomorrow.

Copies should be immediately obtained and an indices check should be made on MULFORD who introduced the Resolution and this should be forwarded by airtel immediately to the Bureau with recommendation as to letters from the Director. If the indices are negative, letter should be suggested to MULFORD and to the Governor.

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CWB:ekk

mulford is a formadae contact

or a record hund of mine.

I initiated the descution, salla

with the for your fixe + woulford

given, then boungered & asta etc.

Ronald Reagan-1967

SEARCHED INDEXED SERIALIZED FILED JUL 25 1967

FBI — SAN FRANCISCO

#### 7/26/67

AIRTEL

AIRMAIL

TO

DIRECTOR, FBI

ALL INFORMATION CONTAINSD

: SAC, SAN FRANCISCO FROM

DATE 3-14-96 BY 35 A 9803 ROD FAC

SUBJECT:

CALIFORNIA STATE ASSEMBLY HOUSE RESOLUTION NUMBER 491 COMMENDING DIRECTOR HOOVER

California State Assemblyman DON MULFORD of Oakland, California, on 7/25/67, authored house resolution number 491 entitled, "Relative to Commending JOHN EDGAR HOOVER" which was read before the Assembly and adopted unanimously.

It read as follows:

"Whereas JOHN EDGAR HOOVER has rendered exceptional service to the people of the United States for 50 years in various positions in the Department of Justice and has been Director of the Federal Bureau of Investigation since 1924; and

Whereas Mr. HOOVER's superlative work has earned him multitudinous honors including the Medal of Merit (awarded by the President of the United States), the Gold Medal of Merit Citation for outstanding service in safeguarding the security of the United States, the distinguished Service Citation of the all-American conference to combat communism, and the Americanism Gold Medal Award and Citation of the Veterans of Foreign Wars; and

3 - Bureau (RM) 2 - San Francisco PJM:cg (5)

cc 80-515

4

Ronald Reagan-1968

500-12-5-36

SF PJM:cg

Whereas, Mr. HOOVER's contribution to the personal security and safety of the nation has been distinguished and exemplary; and

Whereas Mr. HOOVER also has been well known for his unswerving devotion to the advancement of brotherhood among all races, creeds and colors and for his valued efforts in encouraging Christianity among teenagers; and

Whereas on August 4, 1961 the Senate of the United States passed a resolution commending Mr. HOOVER for the 'continued excellence of his devoted and effective service to the nation'; now, therefore, be it

Resolved by the Assembly of the State of California, that the members commend JOHN EDGAR HOOVER on the occasion of his 50th Anniversary in the Department of Justice on July 26, 1967; and be it further

Resolved, that the Chief Clerk of the Assembly be hereby directed to submit a suitable prepared copy of this resolution to JOHN EDGAR HOOVER".

It should be noted that San Francisco indices contain no derogatory information regarding Assemblyman MULFORD. It is recommended that letters of appreciation be forwarded Assemblyman MULFORD and Governor REAGAN.

#### 7/27/67

AIRTEL

: DIRECTOR, FBI TO

ATTENTION: CRIME RECORDS

FROM

SAC, SAN FRANCISCO (80-990)

SUBJECT:

CALIFORNIA STATE ASSEMBLY

HOUSE RESOLUTION NUMBER 491

COMMENDING DIRECTOR HOOVER

ALL INFORMATION CONTAINED HEREIN IS LINCLASSIFIED DATE 3-14-96 BY SSA9803 RNO JAC

Re SF airtel 7/26/67.

Transmitted, herewith, is California Legislature Assembly Daily Journal for 7/25/67.

The Bureau's attention is called to Page 5596 which contains the Resolution honoring the Director.

3 Bureau (Encl.-1) 2 SF (1 - 80-515) JTM:ekk (5)

Ronald Reagan-1970

50-94034



#### State of Unlifornian GOVERNOR'S OFFICE SACRAMENTO 95814

RONALD REAGAN

ALL INFORMATION CONTAINED

ALL INFORMATION CONTAINED

SA GEO3 ROD/JAC

DATA 3-14 46 BY SSA GEO3 ROD/JAC

August 15, 1967

Honorable J. Edgar Hoover Office of the Federal Bureau of Investigation Washington, D.C.

Dear Mr. Hoover:

This letter will serve to introduce to you Professor Hardin Jones of the University of California. He will be requesting an appointment with you during the latter part of August or the first part of September.

I would appreciate your talking to Professor Jones. I'm certain you will find it most worthwhile.

I hope this letter finds you in good health and hope, too, our paths will cross soon.

Sincerely,

RONALD REAGAN

Governor

Ronald Reagan-1971

a fewer

Se- 120. 30

#### August 23, 1967

Honorable Ronald Reagan
The Governor of California
Sacramento, California 95814

ALL INFORMATION CONTAINSO
HEREIN IS TOCKASSIFIED
DATE 3-14-96 BY SSA 9803 ROD JAC

My dear Governor Reagan:

Your letter of August 15, 1967, has been received, and I appreciate your writing concerning Professor Hardin Jones of the University of California.

In view of the uncertain nature of my schedule, it will be impossible to make a definite appointment to see Professor Jones; however, he should feel free to contact my office upon his arrival in the city. In the event other commitments preclude my seeing him, one of my associates will be happy to confer with him.

I certainly appreciate the kind sentiments you expressed and I, too, hope it will be possible for us to get together some time soon.

Sincerely yours,

I. Edgar Hoovez

1 - San Francisco - Enclosure (Sacramento)

Ronald Reagan-1972

eb eb

#### September 22, 1967

AIR MAIL

Hosorable Rosald Resga The Governor of California Sacramento, California 95814

ALL INFORMATION CONTAINED
HEREIN IS UNCLOSSIFIED
DATE 3-14-96BY \$ SA9 BO3RDDLTAK

My dear Governor Reagant

The FBI will open an additional office in the State of California on September 25, 1967. We have been prompted to take this action by our expanding responsibilities and in order to provide increased services to the citizens of your state.

The new office, which is the fourth to be established in California, will be located at 2020 J Street in Sacramento. Special Agent in Charge John H. Williams and his Assistant, Mr. Philip R. Will direct our investigations in the area covered by that facility. You may be assured that we will be glad to be of service to you and your constituents, and please do not hesitate to call upon us when we can be of help.

Sincerely yours,

1 - Sacramento

I - Los Angeles

1 - San Diego

1- San Francisco

Ronald Reagan-1973

A ACITY TO

50-110-40

ASAC MORELAND

SUBVERSIVE ACTIVITIES UNIVERSITY OF CALIFORNIA BERKELEY CAMPUS

ALL INFORMATION CONTAINED
HEREIN IS LINCLASSIFIED
DATE 3-14-96 BY SSAGO-3RADUTAC

On 12/26/67, Mr. CHARLES D. BRENNAN, Div. 5 (SOG), called and advised that Governor REAGAN has requested to see the Director and arrangements have been made for a meeting in January, 1968.

Mr. BRENNAN advised that this office prepared a very fine comprehensive study of the situation at the University of California in 1965, which was captioned "SUBVERSIVE ACTIVITIES, UNIVERSITY OF CALIFORNIA, BERKELEY, 11/1/65."

He requested that this be updated, bringing it to a current status, including anything reflecting on the subversive picture at UC, as well as anything involving political relations, that is, how politics influences action or failure to take action at UC, such items as President KERR being dismissed, and any other pertinent things which the Governor might pose to the Director.

He desires this in letterhead form, however, he pointed out that it would be fine for any observations of the Agents to be included, since this will not be disseminated but will merely be used to make a brief for the Director. He suggested also that we include anything concerning the Governor's position on law enforcement, demonstrations at the University, etc.

While it was not requested by the Bureau, in view of the recent activities at San Francisco State, it is also suggested that brief information be included concerning that institution.

Mr. BRENNAN advised that the BUDED for receipt of this material is 1/2/68. This means this must go out no later than Friday, 12/29/67.

2 - SF 100-- SF 80-990 (Gov. REAGAN) JTM:hko (3)

Ronald Reagan-1974

C7-990-41

### SHOWDOWN FORCED

# Reagan's Role U.C. Troubl

In one year, Ronald Reagan has become a national political figure. The test of his a b i l i t y will come in his relations with the legislature next year. Here is the second of a series of articles looking to the future.

#### By DAVE HOPE **Tribune Political Writer**

One campaign promise that Gov. Ronald Reagan did not keep was his pledge for ■ full-fledged investigation of student riots at the University of California.

Several things intervened.

His proposal for tuition charges to help pay educational costs and provide scholarships and loans for low income students aroused violent pposition.

U.C. President Clark Kerr alled for a showdown on his support such legislation." status and Assembly Speaker Jesse Unruh forced a vote by the regents. Kerr was fired and eight months elapsed before his successor was chosen.

Budget cuts for higher education raised new storm of protest.

So the investigation was somehow lost in the shuffle.

However, some progress has been made toward restoring order. There have been no

#### Second in a Series

strikes on the U.C. campus since Reagan went into office and, only recently, have ununiversity facilities as ■ staging ground for off-campus demonstrations.

But as the vear waned, a couple of violent outbreaks at tion," the regents will give

produced reaction in favor of Reagan's insistence that order must be maintained on uni- cancies by death or resignaversity and college campuses tion, he will have only two "so that the vast majority of posts to fill and neither of the students who attend to learn incumbents is from the solid right."

Reagan amplified his stand: 'It is not political interfer- ble. nce to demand that those at-

campus."

what legislation they need to 1980. control the campuses "and I promise that this administr tion will sponsor and actively

Echoes came quickly from unexpected places.

The Assembly Education Committee ordered an investigation of student disorders and it was supported by Assembly Speaker Jesse Unruh who just vear ago was defending Kerr and opposing a similar probe for the universi-

Unruh went so far as to say it appeared that the president of San Francisco State should be fired and he called for usting any students or professors who engage in illegal emonstrations.

On another score, it now apruly students resumed using pears that the U.C. regents will approve a substantial increase in student "fees." Saving face by using that term instead of the nesty word "tui-

Reagan what he says is need-

And administrators have trimmed their budget requests somewhat, anticipating that Reagan's blue pencil is still sharp.

One thing Reagan will not be able to do next year is to change the complexion of the U.C. Board of Regents.

Disregarding possible vaand study can have that core of friends of former Gov. Edmund G. Brown who have caused Reagan the most trou-

These include Norton Simon tending these institutions of of Fullerton, high school higher learning either follow classmate of Brown, whose the rules or get their education elsewhere," he said. G. Dutton, Washington, D.C., "There is no place our col- twice campaign manager for lege and university system for Brown, whose appointment those teachers and professors expires in 1978; William Matwho lead or join in disobedi- son Roth, also of Washington, ence and law breaking on campaign fund-raiser for Brown, and William K. Cob-Le called on the trustees of lenz, San Francisco, special state colleges and the U.C. counsel to the former goverboard of regents to spell out nor, whose terms go until (Indicate page, name of newspaper, city and state.)

14-96 SSA 9803 LOD /540

Oakland Tribune

Cakland, Calif.

Date:

Final Edition:

Author:

Editor:

Vm.F.Knowland

SF

Title:

Character:

OF

Classification:

Submitting Office:

Being Investigated

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TYPE FREGR



CLARK KERR Called for Showdown



GOVERNOR REAGAN 'Follow the Rules'



JESSE UNRUH Forced a Vote



# **Reagan Links** Campus Unrest taltees for more vigorous to ures to control cam-To RFK Deat

thos who are fearful and silent but apparently without power, is likely to strengthen confidence in society, in leadership, in fair play?"

Examiner Capitol Bureau

on campuses of California's fam. colleges and universities may be partly blamed for the "climate of violence" in which Senator Robert F Hennedy was assassinated according to Governor Rea-

gan. In a letter to UC regents and State college trustees released yesterday, Reagan be models for what is good said: "A sick campus community in California in many for our society. ways is responsible for a sick community around those and we have it in our authorcampuses."

#### HEALTH, TOO

Chairman Theodore Merreplied there may be some the faculty and of the adminiam of the college tructed

there, too."

Reagan criticized the regents and trustees for the degree to which they take delegated away responsibility and characteristics.

The asked whether regents and trustees believe past disty and abandoned principle" or campuses had no and for "their pattern of only effect on citizens. reacting to crisis meeting by meeting."

tion is complex problem, them a victory in fact," the involving diverse views of governor wrote. many diverse people.

#### GOALS

real answers are difficult SACRAMENTO — Violence and complicated," said Mer-

Reagan suggested the re tents and trustees "reassess heir own goals" and Merian agreed.

"Long have we heard that we should yield to the ideas and leadership of these insti-tutions, wrote Reagan.

Let these communes then

"It is our responsibility. ity to see to it that they are."

#### THE EFFECTS

Reagan said "members of sickness on some campases, istration" had "constant re"but there is a lot of health sistance to the rightful place

bone case, he recalled, a police car was held and a Meriam said he agreed Berkeley officer "impris-

there has been some "ap- and."

peasement," but denied principles have been abandousd.

He said the governing of wictory by those who broke institutions of higher educations and which was principled by the law, and which was principled by the law of the law o

#### MORE CONTROL

Do you think that con-"Simple enswers may stant appeasement of those to be answers, but the who coerce, and ignoring 1496 SSA9803RDD SAE

10 S.F. Examiner

(Indicate page, name of newspaper, city and state.)

San Francisco, Calif.

6-12-68 a Edition: Final Montex Author:

Editor: Edmund J.Dooley

Character: OF

Classification:

Submitting Office:  ${\sf SF}$ 

Reing Investigated

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Ronald Reagan-1977

### 'It Is Anarchy'

# Reagan's Attack n Today's Rebels

From Our Correspondent

Columbia. Tuolumne county

Governor Ronald Reagan told an Independence Day celebration here yesterday that the tyranny of mob rule is eating away at the nation's sturdy foundations.

"We were born in revolution, but today there are those in our midst striving to engage our society in another revolution," the

added.

buildings.

governor declared to the them in their person and sun-drenched crowd of their property?" Reagan

And the objective of this latter-day revolution, Reagan responsibility to protect sowanned, "is not freedom. It cuty from the lawbreakers, is anarchy." is anarchy."

Reagan chose this once around, and perhaps we booming gold rush town in would see a decline in the the heart of the Mother Lode purchase of weapons," the country to level an attack governor declared. against the forces he sees threatening the nation.

He said the reason so many Americans are buying agents and sheriff's deputies guns is "because they have lost faith in government's ability to protect them."

The governor noted that the sale of handguns throughout the nation has been soaring in recent times.

that criminals in such num-domestic institutions "are bees are rushing into gun like kids taking apart an old stores and buying guns with alarm clock." Added Reawhich to commit acts of violence?" he said.

numbers of citizens - legiti- how to put the clock back tomate, God fearing, law gether again. They can reabiding citizens — are buy build none of what they ing those guns because they would m carelessly tear have lost faith in govern-down." ment's ability to pretect The aim of today's youthful

dissenters, said Reagan, "is not to build a nation of laws. but to create a condition of tyranny - tyranny of the mob, where might makes right and no man is safe in his own home."

> ALL BEOGRAPHON CONTAINS SSA 9303RDD/5A

> > 1 S.F.Chronicle

(Indicate page, name of newspaper, city and state.)

San Francisco, Calif.

Date: 7-5-68 Edition: Final Home

Editor: Chas. deYoung Title: Thieriot

GOV.RONALD REAGAN

Character:

or SF 80-990 Classification 80

Submitting Office: SF

Being Investigated

DISSENTERS

instead of the other way

As Reagan spoke, at least

a score of uniformed State

policemen, Secret Service

surrounded the grandstand and rostrum and several

armed State police viewed

the crowd from atop nearby

He said the youthful dis-Can we honestly believe senters attacking the nation's

"Success to them is finding Isn't it time we point out way to stop the ticking, but to someone that increased they haven't the vaguest idea

Ronald Reagan-1978

BENN SEL

CC TO BIREAU DY ES 17/5/68



#### State of California governor's office sacramento 95814

RONALD REAGAN

March 23, 1971

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-14-96 BY SSA9803RDD SAE

Mr. J. Edgar Hoover Director, Federal Bureau of Investigation Department of Justice Washington, D.C.

Dear Mr. Hoover:

I have just learned of your latest generosity where I am concerned through Mr. Ed Hickey who is in charge of our security. Once again, I am in your debt and just wanted you to know how very grateful I am.

Here in California, the great cooperation we've always had with the Bureau continues and is a source of great comfort to me and, indeed, to all of us.

Again, my heartfelt thanks and very best wishes.

Sincerely,

RONALD REAGAN

Governor

Ronald Reagan-1979

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80-990-45

#### A Vote Against State Crime Plan

Sacramento

The State Senate Finance Committee shot down yesterday a cornerstone of Governor Ronald Reagan's crime - busting plan for California: a controversial revision in the rules of courtroom evidence.

The bill would eliminate the so-called "exclusionary rule." That rule, basically, an evolution of several court decisions over the years that prohibit evidence from being submitted in court if it was obtained illegally.

alternative Reagan's would allow nearly all types of illegally obtained evidence to be used in court, but, at the same time, Government would become liable for damages resulting from the search.

Exempted would be evidence gained by illegal wiretaps or other electronic spying which would remain inadmissible.

The legislation failed on a party line 6-5 vote with Democrats casting the disenting votes and Republicans veting "aye." The measure neded at least seven favor-Ble votes for passage.

Even as the committee

was considering the bill, Reagan told a news conference he was "a little shocked at the carelessness" with which his proposal had been "interpreted."

He said abolition of the "exclusionary rule" actually had been suggested by Chief Justice of the United States Warren Burger.

"No one is advocating suddenly turning law enforce ment loose with no need for warrant to go ahead with illegal search and seizure," the Governor said.

Senator Robert J. Lagomarsino, (Rep-Ojai), author of the bill, miled for and received permission to seek to have the measure's datest reconsidered, probably to-day. He said one absent Democrat - Senator Alan Short of Stockton-"waned to take a look at it."

United Press

(Indicate page, name of newspaper, city and state.)

S.F.Chronicle

San Francisco, Calif.

Moust 15, 1072 Date:

Edition: Home

Author: and Pub.:Chas.
Editor:deYoung Thieriot

Character:

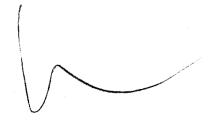
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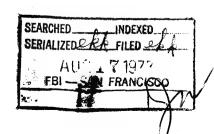
Submitting Office:SF

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Ronald Reagan-1980





#### Ban on Exclusionary Rule

#### An OK for Reagan **Evidence** 3

#### Sacramento

mittee reversed itself yes-Governor Ronald Reagan's submitted in count if it was bill to allow submission in obtained illegally. court of evidence obtained by illegal police search mit nearly any type of illeand seizure.

Senator Alan Short (Dem-Stockton), an attorney, provided the go ahead vote when he split from Democratic ranks and joined with Republicans in approving the measure on a 7-5 roll eall. At least seven favor able votes were needed.

The committee on a party line vote scuttled the measure on Tuesday when Short was absent. But Senator Robert J. Lagomarsino (Rep-Ojai), received permission to have the action reconsidered.

On initial roll call vesterday, Short abstained from voting. Later, he voted "aye" on the measure heavilv lobbied by the Reagan Administration.

The bill, opposed by the American Civil Liberties Union and the California. Trial Lawyers Association, went to the Senate floor where simple majority of 21 votes is required for passage to the Assembly.

The bill, a keystone of Reagan's newly announced plan for "controlling crime in California," would eliminate the so-called "exclusionary rule" in favor of procedure allowing persons to sue for damages as a re sult of illegal searches mi seizures but still permit the

evidence to be used in court.

The Senate finance con- The rule, basically, is an evolution of decisions which terday and approved prohibit evidence from being

> Reagan's bill would pergally obtained evidence to be submitted but at the same time government would become liable for damages or suffering resulting from the search and the aggrieved citizen could file a civil suit for recovery.

United Press

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED BY SSA983RAD TACE B-14-96 BY SSA983RAD TACE CHOS, 193)

S.F.Chronicle San Francisco, Calif.

(Indicate page, name of newspaper, city and state.)

8-16-73 Edition: Home and Pub.:Chas.

Editor:deYoung Thieriot

RONALD REAGAN

or SF 80-990 Classification: Submitting Office:SF

Being Investigated

SEARCHED. INDEXED SERIALIZED PRA FILED 1 AUG . 7 1973 EBI - SAN FRANCISCO

by RS 8/17/13

Ronald Reagan-1981

#### RONALD REAGAN GOVERNOR OF CALIFORNIA

 California Legislature Assembly Daily JOurnal for 7/25/67 -(Page 5596 - Resolution honoring Director).
 Filed 7/27/67 ekk

ALL INFORMATION CONTAINED
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DATE 3-14-96 BY 55A98542005AC
(405, 193)

Ronald Reagan-1982



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JUL 27 1967	
FBI - SAN FRANCISCO -	
	17

80-990-1A

## CALIFORNIA LEGISLATURE

1967 REGULAR SESSION

# ASSEMBLY DAILY

ONE HUNDRED TWENTY-NINTH LEGISLATIVE DAY TWO HUNDRED FIFTH CALENDAR DAY

#### IN ASSEMBLY

Tuesday, July 25, 1967 Assembly Chamber

Hon. Carlos Bee, Speaker pro Tempore of the Assembly, presiding. Assistant Chief Clerk R. Brian Kidney at the Desk. Assistant Clerk Malcolm MacIntyre reading. The Assembly met at 9 a.m.

ROLL CALL

The roll was called.

Call of the Assembly

Pending the announcement of the vote, Mr. Priolo moved a call of the

Mr. Cullen seconded the motion.

Motion carried. Time, 9:05 a.m.

The Speaker pro Tempore directed the Sergeant at Arms to close the doors, and to bring in the absent Members.

Quorum Call of the Assembly Dispensed With

At 9:20 a.m., on motion of Mr. Badham, the quorum call of the Assembly was dispensed with.

The roll call was completed, and the following answered to their

Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Duffy, Dunlap, Billott, Fenton, Rong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Rarabian, Retchum, Rnox, Lanterman, MacDonald, McGee, McMillan, Meyers, Milas, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Balph, Roberti, Russell, Ryan, Schabarum, Shomaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veneman, Veysey, Wakefield, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—77.

Quorum present

ALL INFORMATION CONTAINED

HEREIN IS UNCL

5562

# NAMES OF MEMBERS PLACED UPON MORNING ROLL CALL

names of the following members, who are attending the meeting of the Committee on Rules, be placed upon the morning roll call: Messrs. Gonsalves, Quimby, Ray E. Johnson, Russell, Britschgi, and Speaker pro Tempore Bee was granted unanimous consent that

#### PRAYER

The following prayer was offered by the Acting Chaplain, Rabbi Cyrus Arfa:

Heavenly Father. Our days pass away like shadow, and Thou art from everlasting to everlasting. We are transient like the dust, but Thou art Eternal. We are prone to error and sin, and Thou art pure Spirit. Help us, as we open a new day in the volume of life, to draw more nigh unto Thee and thus become more true to our God-given destiny. May we grow deeper in understanding and broader in charity. Thou, O Lord, who givest life, we pray Thee give us also at all times the true content of life.—AMEN.

## PLEDGE OF ALLEGIANCE TO THE FLAG

Upon request of Speaker pro Tempore Bee, Mr. Biddle then led the Assembly in the pledge of allegiance to the Flag.

# MOTION TO DISPENSE WITH READING OF THE JOURNAL

Further reading of the Journal of the previous legislative day was dispensed with on motion of Mr. MacDonald, seconded by Mr. Belotti.

## LEAVES OF ABSENCE FOR THE DAY

The following Member was granted leave of absence for the day, because of illness:

Ronald Reagan-1984

Mr. Monagan, on request of the Speaker pro Tempore.

The following Member was granted leave of absence for the day, because of legislative business elsewhere:

Mr. Stull, on request of the Speaker pro Tempore.

The following Member was granted leave of absence for the day, on personal business, and desired to waive his per diem:

Mr. Hinckley, on request of the Speaker pro Tempore.

## **EXPLANATION OF ABSENCE**

The following explanation of absence was presented by the Speaker and ordered printed in the Journal, pursuant to Assembly Temporary Rule No. 118:

July 24, 1967

Sacramento, California Room 3164, State Capitol Speaker to the Assembly Honorable Jesse M. Unruh

Dear Mr. Speaker: Will you please excuse me from the session of July 25th for reasons of legislative business in my district

Sincerely,

JOHN STULL, Assemblyman Eightieth District

ASSEMBLY JOURNAL July 25, 1967

## REPORTS OF STANDING COMMITTEES

Asembly Chamber, July 25, 1967 Committee on Engrossment and Enrollment

Mr. Speaker: Your Committee on Engrossment and Enrollment has examined:

Assembly Concurrent Resolution No. 105

And reports the same correctly re-engrossed.

Above resolution ordered on file.

Assembly Chamber, July 25, 1967

STACEY, Chairman

Mr. Speaker: Your Committee on Engrossment and Enrollment has examined: Assembly Constitutional Amendment No. 51

And reports the same correctly engrossed.

STACEY, Chairman

Above resolution re-referred to the Committee on Revenue and Tax-

Committee on Social Welfare

Assembly Chamber, July 24, 1967 Mr. Speaker: Your Committee on Social Welfare reports:

Senate Concurrent Resolution No. 64

With the recommendation: Be adopted.

CHAPPIE, Chairman

Above resolution ordered on file.

Assembly Chamber, July 24, 1967 Mr. Speaker: Your Committee on Social Welfare reports:

Senate Bill No. 727 Senate Bill No. 1194

With the recommendation: No pass, and be re-referred to the Committee on Ways and Means.

Above bills re-referred to the Committee on Ways and Means.

Assembly Chamber, July 24, 1967

Mr. Speaker: Your Committee on Social Welfare reports: Senate Bill No. 1277

CHAPPIE, Chairman as amended, With amendments with the recommendation: Amend, do pass, re-referred to the Committee on Ways and Means.

Above bill ordered to second reading.

## MESSAGES FROM THE SENATE

Senate Senate Chamber, Sacramento, July 24, 1967 Mr. Speaker: I am directed to inform your honorable body that the Sena amended, and on this day passed as amended:

Assembly Bill No. 889
Assembly Bill No. 910
Assembly Bill No. 1199
Assembly Bill No. 1274
Assembly Bill No. 1676

Assembly Bill No. 1745 Assembly Bill No. 1838 Assembly Bill No. 1910 Assembly Bill No. 2407

And respectfully requests your honorable body to concur in said amendments.

J. A. BEEK, Secretary of the Senate By Larry D. McConnell, Assistant Secretary

Above bills ordered to unfinished business file.

5564

Mr. Speaker: I am directed to inform your honorable body that the Senate on this day passed: Senate Chamber, Sacramento, July 24, 1967

Assembly Bill No. 76 Assembly Bill No. 336 Assembly Bill No. 1308

Assembly Bill No. 1766 Assembly Bill No. 2155

J. A. BEEK, Secretary of the Senate . By Larry D. McConnell, Assistant Secretary

Above bills ordered enrolled

Mr. Speaker: I am directed to inform your honorable body that the Senate on Senate Chamber, Sacramento, July 24, 1967 this day passed

Senate Bill No. 359

J. A. BEEK, Secretary of the Senate By Larry D. McConnell, Assistant Secretary

Mr. Speaker: I am directed to inform your honorable body that the Senate on this day adopted: Senate Chamber, Sacramento, July 24, 1967

Senate Concurrent Resolution No. 87

J. A. BEEK, Secretary of the Senate By Larry D. McConnell, Assistant Secretary

### SENATE BILLS FIRST READING AND REFERENCE OF

The following bills were read the first time:

Revenue and Taxation Code and to add Sections 12426 and 29111 to the Government Code, relating to postponement of the payment of and 2639 to the Senate Bill No. 359—An act to add Sections 471 property taxes

Held at Desk by order of the Speaker pro Tempore.

Senate Concurrent Resolution No. 87-Relative to La Fiesta de La Bandera.

Reagan-1985

Held at Desk by order of the Speaker pro Tempore.

## ASSEMBLY BILLS RETURNED TO SECOND READING FILE CONSIDERATION OF DAILY FILE

Pursuant to the Assembly Rules, the following Assembly Bill was PURSUANT TO THE RULES

this day on the second reading file:

Assembly Bill No. 1535 ordered to the consent calendar, subsequent to re-engrossment.

## SENATE BILLS RETURNED TO SECOND READING FILE PURSUANT TO THE RULES

Were Pursuant to the Assembly Rules, the following Senate Bills this day on the second reading file.

Senate Bills Nos. 1051, 18, 1253, 1504, 1542, and 32,

Senate Bills Nos. 1051, 18, 1253 and 32 ordered to third reading. Senate Bill No. 1504 ordered to the Consent Calendar. Senate Bill No. 1542 passed temporarily on file. NOTE: Later this day Senate Bill No. 1253 was re-referred to the Committee III Ways and Means.

July 25, 1967

## SECOND READING OF SENATE BILLS

ASSEMBLY JOURNAL

Senate Bill No. 647—An act to add Chapter 6.5 (commencing with Section 13600) to Division 7 of the Water Code, relating to state cooperation and participation with the federal government with respect to federal grants for construction of sewage treatment facilities.

Bill read second time.

## Consideration of Committee Amendments

Water, The following amendment, proposed by the Committee on was read, and adopted:

#### Amendment No. 1

In line 4 of the heading of the printed bill, = amended in Assembly July 18, 1967, strike out "and Knox", and insert ", Knox, Davis, Porter, and Chappie".

Bill ordered reprinted, and to be re-referred to the Committee on Ways and Means.

# RE-REFERENCE OF BILLS PURSUANT TO THE RULES

of the Assembly Rules, the following bills were ordered re-referred to On advice of the Legislative Counsel, and pursuant to the provisions the Committee on Ways and Means:

Senate Bill No. 1253.

Ronald

### REQUEST FOR UNANIMOUS CONSENT TO TAKE UP ASSEMBLY BILL NO. 910

Senate Gonsalves was granted unanimous consent to take up amendments to Assembly Bill No. 910, without reference to file.

#### CONSIDERATION OF SENATE AMENDMENTS TO ASSEMBLY BILL NO. 910

Assembly Bill No. 910—An act to amend and renumber the heading of Chapter 3 (commencing with Section 62801), Part 3, Division 21 of, to add Chapter 3 (commencing with Section 62700) to Part 3, Division 21 of, and to repeal Article 16 (commencing with Section 62271) of Chapter 2, Part 3, Division 21 of, the Agricultural Code as proposed by Senate Bill No. 1, relating to milk, and making an appropriation therefor.

The question being: Shall the Assembly concur in the following Senate amendments to Assembly Bill No. 910?

## Senate Amendments of June 21, 1967

Amendment No. 1

of the printed bill, as amended in Assembly May 22, 1967, "a". Amendment No. 2 On page 3, line 12, strike out "plans and", and insert "plan and to". On page 3, line 11, after "develop", insert

#### Amendment No.

On page 3, strike out lines 13 and 14, and insert "plan will be made effective. He shall appoint fluid milk producers, and representatives of such producers, to be the members and alternate members of a formulation committee, reasonably representative of all producers and areas to be included in such proposed pooling plan, which committee shall advise with and assist the director in the establishment of the proposed pooling plan area and in the formulation of the proposed pooling plan. Such pooling plan shall".

#### Amendment No. 4

ASSEMBLY JOURNAL

5566

On page 3, lines 22 and 23, strike out "regional pooling plans", and insert "pools".

#### Amendment No.

the advice and assistance of "director", insert ", with 3, line 24, after On page 3, line 24, after the formulating committee,

#### Amendment No. 6

On page 3, line 25, strike out "plans", and insert "plan". Amendment No. 7

## after "shall", insert ", if possible,".

line 25,

On page 3,

and insert "pool areas" On page 3, line 49, strike out "any pooling plan area", Amendment No. 8

#### Amendment No. 9

On page 4, line 1, strike out "pooling plan", and insert "pool"

#### Amendment No. 10

area and pooling plan", and strike out "pooling plan က် andOn page 4, lines 2 insert "pool".

#### Amendment No. 11

insert pooling plan", and out "pooling plan area and On page 4, line 4, strike "lood"

#### Amendment No. 11.1

On page 4, line 6, strike out "pooling plan", and insert "pool".

#### Amendment No. 12

On page 4, strike out lines 7 to 31, inclusive, and insert "62707. The formulation committee shall make recommendations to the director for inclusion in the pooling plan, and the director shall include in the pooling plan,

(a) The establishment of one or more pools throughout the state.
(b) The base period to be used by the director in determining the production and usage bases of each producer directly affected by the pooling plan. Such base period shall mean an historical period of fluid milk production for, and usage in, the pool area which the committee finds is reasonably equitable to all producers directly affected by the pooling plan, and will tend to effectuate the declared purposes of this chapter. The historical period shall not include any production after January 1, 1967."

#### Amendment No. 13

On page 4, line 32, strike out "(b)", and insert "(c)".

#### Amendment No. 14

On page 4, line 37, strike out "(a)", and insert "(b)".

## Amendment No. 15

On page 4, line 38, strike out "(c)", and insert "(d)"

#### Amendment No. 16

On page 4, line 40, strike out "(b)", and insert "(c)".

#### Amendment No. 17

On page 4, strike out lines 41 to 52, inclusive; and on page 5, strike out lines 1 to

35, inclusive, and insert

"(e) The allocation of new usage in a manner consistent with effectuating the purposes of this chapter.

(f) The establishment of production bases and quotas for new fluid milk producers who wish to enter the pooling plan after the effective date of the plan. The recommendations of the committee shall be reasonably equitable to both such new producers and to participating producers and consistent with effectuating the purposes of this chapter.

(g) The transfer of production bases and quotas from one fluid milk producer to another under conditions so designed as to prevent abuses in such transfers and to avoid the development of excessive values for such bases and quotas.

(h) Any and all other matters necessary and desirable to effectuate the provisions of this chapter."

July 25, 1967

Amendment No. 18

ASSEMBLY JOURNAL

On page 7, lines 7 and 8, strike out "pooling plans", and insert "pools"

Amendment No. 19

plans", and insert "pools", strike out "pooling and 11, lines 10 ۲, page

Amendment No. 20

out "pooling plan", and insert "pool". strike Sį page 7, line 0

out "act", and insert "chapter"

7, line 47, strike

0

Amendment No. 21

οċ 7, strike out lines 48 to 50, inclusive, and strike out page Amendment No. 22 page Ö

Amendment No. 22.5

out "regional".

strike

9, line 1,

page

Ö

Amendment No. IS

out "62717", and insert strike တ် line

after the period, insert "The producer's pool quota shall amount when all his production meets the specified standinsert "The full, line its f 6,5 On page 9 be restored t ards."

Amendment No. 24

Amendment No. 25

On page 9, line 28, strike out "62718", and insert "62714".

out "such pooling plans", and insert "the pooling Amendment No. strike 23 line ټ ټ On page plan",

Amendment No. 27

Ronald Reagan-1986

pooling "Shall the proposed 39 and 40, and insert plan be made effective?"

Amendment No. 🔤

On page 9, line 48, strike out "62719", and insert "62715".

Amendment No. 29

On page 9, lines 49 and 50, strike out "regional pool plans covering all proposed pooling areas in the state", and insert "pooling plan".

Amendment No. 30

On page 10, line 2, strike out "plans", and insert "plan". Amendment No. 31

page 10, line 3, strike out "plans", and insert "plan".

On page 10, line 10, strike out "plans", and insert "plan". Amendment No. 32

On page 10, line 15, strike out "plans", and insert "plan". Amendment No. 33

On page 10, line 16, strike out "such plans are", and insert "the plan is" Amendment No. 34

Amendment No. 35

new plans", and insert "plan, out "plans, or submit 10, line 17, strike new plan". On page 10, li submit a new 0 0

On page 10, line 18, strike out "plans were", and insert "plan was" Amendment No. III

On page 10, line 20, strike out "all plans", and insert

Amendment No. M

On page 10, line 24, strike out the second "plans", and insert "plan".

Amendment No. 39

ASSEMBLY JOURNAL

On page 10, line 32, strike out "62720", and insert "62716".

Amendment No. 40

On page 10, line 35, strike out "plans", and insert "plan".

On page 11, line 4, strike out "62721", and insert "62717" Amendment No. 41

On page 11, lines 6 and 7, strike out "regional pool plans", and insert "pool plan". Amendment No. 42

Amendment No. 43

Amendment No. 44 On page 11, line 25, strike out "62722", and insert "62718". On page 11, line 29, strike out "62723", and insert "62719".

Amendment No. 45 On page 11, line 32, strike out "62724", and insert "62720".

On page 11, line 50, strike out "62724", and insert "62720". Amendment No. 46

Amendment No. 47 On page 12, line 8, strike out "62725", and insert "62721".

Amendment No. 4

On page 12, line 11, strike out "62726", and insert "62722". Amendment No. 📭 On page 12, line 14, after the period, insert "If necessary to effect the purposes of this chapter, the director, in establishing the minimum prices which shall be paid for fluid milk to producers, may establish minimum producer prices applicable at the producer's place of production."

Amendment No. 50

On page 12, line 15, strike out "62727", and insert "62723".

On page 12, line 20, strike out "any pooling plans", and insert "the pooling plan".

Amendment No. 51

Amendment No. 52

On page 12, between lines 26 and 27, insert

"62724. The director is the instrumentality of this state for the purpose of administering and enforcing the provisions of this chapter and to execute the legislative intent which is expressed in this chapter, and is hereby vested with the administrative authority which is described in this chapter. Notwithstanding other laws to the contrary, in the event a milk marketing order under the jurisdiction of the United State Department of Agriculture or other appropriate federal agency, is created by referendum or under the applicable laws and procedures relating thereto, in this state or in any geographical area within this state, the provisions of this chapter or any part thereof which is in conflict with send, federal order, or which is unaccessary or is a duplication thereof, shall be suspended in the geographical area covered by and during the existence of such federal order. The director shall take such steps and procedures as are necessary to wind up and conclude the administration and enforcement of the provisions of this chapter, or any part thereof, prior to the suspension

Amendment No. 53 On page 12, line 27, strike out "62728", and insert "62728". On page 12, line 47, strike out "62729", and insert "62726". Amendment No. ங

On page 13, line 3, strike out "62730", and insert "62727".

July 25, 1967

ASSEMBLY JOURNAL

5569

Amendment No. 56

On page 13, line 6, strike out "62731", and insert "62728".

Senate Amendments of June 22, 1967 Amendment No. 1

On page 4, strike out lines 10 and 11, of the printed bill, as amended in Senate June 21, 1967, and insert "662706. The pooling plan shall prescribe the pooling area to be covered by each pool. Any such pooling".

Amendment No.

On page 5, between lines 18 and 19, insert

"As to a producer south and east of San Gorgonio Pass, his production base may at his option, be four times his production in the months of December, 1965, and January and February, 1966.

vided that the distributor or cooperative association was required to accept a larger amount of fluid milk from such producer than the producer actually produced during such period, on proof satisfactory to the director of such contract or allocation, the producer may, at his option, have the amount specified in the contract or allocation established as his production base." If producer, during any such base period, had valid contract with distributor, or as member of a cooperative association had an allocation, which pro-

Amendment No.

On page 6, between lines 39 and 40, insert 62707.5. If a portion of the pool quota of any producer is transferred, it shall carry with it the same quantity of production base, and the production has partial transfer of his pool quota shall lose a percentage of his production has equal to the percentage of his pool quota which is so transferred. If a production base transfers his entire production base to one person, his entire pool quota shall also be transferred to the recipient of the production base, and, if a producer transfers his entire pool quota to one person, his entire production base shall also be transferred to the recipient of the production base, and, if a producer transfers ferred to the recipient of the pool quota.

pursuant to regulations adopted, after public hearings, consistent with the purposes of this chapter. Permanent records shall be maintained by the director of all transtransfers of production base and pool quota shall be recorded by the director All

actions in either production base or pool quota.

Any person who purchases or otherwise acquires a producer's business or portion of a producer's business prior to the operative date of the pooling shall succeed to that same proportion of the producer's production base and quota."

Ronald Reagan-1987

Amendment No. 4

On page 10, between lines 3 and 4, insert '62713. All new pool quota made available to existing producers shall be allocated by the following formula:

(a) Each individual producer shall be assigned 

percentage of any new pool

poolpercent of cauche by the tourwing tournear shall be assigned percentage of any new later a variable on the basis of a factor, the numerator of which is 50 percent his individual production base plus 50 percent of the difference between his lateral production base, and the denominator of which shall be the quota and his production base, and the denominator of which shall be the of all the numerators of all producers within the pool.

(b) Allocations shall be made on the basis of each individual producer, y each cooperative association considered as a single producer. The cooperative ass

each cooperative association considered as a single producer. The cooperative associations of producers shall reassign any new quota to their own members subject to the provisions of Section 62710.

(c) No allocation shall be made to any producer for any new pool quota in excess of the equalization point as expressed in subdivision (c) of Section 62712."

Amendment No. On page 10, line 4, strike out "62716", and insert "62714",

On page 10, line 12, strike out "62713", and insert "62715".

On page 10, line 34, strike out "62714", and insert "62716".

On page 11, line 5, strike out "62715", and insert "62717".

ASSEMBLY JOURNAL

On page 11, line 32, strike out "are", and insert "is". Amendment No. 9

Amendment No. 10 On page 11, line 41, strike out "62716", and insert "62718".

Amendment No. 11 On page 12, line 12, strike out "62717", and insert "62719".

Amendment No. 12 On page 12, line 34, strike out "62718", and insert "62720".

On page 12, line 39, strike out "62719", and insert "62721". Amendment No. 13

On page 12, line 43, strike out "62720", and insert "62722". Amendment No. 14

On page 13, line 9, strike out "62720", and insert "this section" Amendment No. 15

Amendment No. 16 On page 13, line 18, strike out "62721", and insert "62723".

Amendment No. 17 On page 13, line 22, strike out "62722", and insert "62724".

Amendment No. 18

On page 13, line 31, strike out "62723", and insert "62725". Amendment No. 19

On page 13, line 40, strike out "62724", and insert "62726". On page 14, line 8, strike out "62725", and insert "62727".

Amendment No. 21 On page 14, line 29, strike out "62726", and insert "62728". On page 14, line 36, strike out "62727", and insert "62729".

Amendment No. 23 On page 14, line 40, strike out "62728", and insert "62730".

Senate Amendments of June 27, 1967

Amendment No. 1

1967, strike On page 3, line 46, of the printed bill, as amended in Senate June 22, t", if possible,".

Amendment No. 2

the allocation of pool quota On page 5, strike out line 13, and insert "(e) The determination of new class 1 usage and based thereon in a manner consistent with".

Amendment No. |

On page 5, between lines 14 and 15, insert

"All producers who have not reached the equalization point shall share in such
allocation of pool quota on the basis of a formula which shall give substantial weight
to each producer's production base, but which at the same time shall allocate a
larger percentage to hardship cases and low class 1 usage producers.
Such allocations shall be made on the basis of each individual producer, with each
cooperative association considered as a single producer. The cooperative associations
of producers shall reassign any new quota to, their own members subject to the
provisions of Section 62710.

Ronald Reagan-1988

ASSEMBLY JOURNAL

No allocation shall be made to any producer for any new pool quota in excess of the equalization point as expressed in subdivision (c) of Section 62712.

Annually, within not more than two months after August 31 of each year, the pool quota shall be adjusted to reflect any such additional pool quota. It is intended that such increase shall generally reflect the increased class 1 usage which developed during the preceding year, adjusted for the director's estimate of class 1 requirements for the succeeding year, allocated in the manner specified in the pool plan. There shall be no downward adjustment of pool quota below the quota initially established pursuant to this chapter."

Amendment No. 4

On page 5, between lines 26 and 27, insert "The recommendations of the formulation committee and the pooling plan may provide exceptions from the plan's general application for individual cases of hard-

Amendment No. 5

On page 8, strike out lines 9 to 24, inclusive.

Amendment No.

On page 8, line 38, after "producer", insert ", provided that all contract quality requirements by the distributor are identical as to all producers under contract with that distributor".

Amendment No. 7

On page 12, strike out lines 49 to 51, inclusive; and on page 13, strike out lines

1 to 3, inclusive, and insert

"62728. The director shall terminate any pooling plan in effect in any marketing area without notice or hearing at any time that there ceases to be a stabilization and marketing plan in force and effect in such marketing area, establishing minimum prices to be paid to producers, unless minimum prices payable by distributors to producers for fluid milk in such marketing area are subject to a federal milk marketing agreement or order which is not in conflict with, or in duplication of, the pooling plan."

Senate Amendments of July 14, 1967

Amendment No. 1

Senate June 27, 1967, strike of the printed bill, as amended in a and insert "Zenovich and Ketchum" In the heading of out "and Zenovich", a

On page 3, line 29, strike out "such".

Amendment No. 3

On page 3, line 45, strike out "formulating", and insert "formulation"

On page 3, line 48, after "each proposed", insert "pooling" Amendment No. 4

Amendment No.

On page 4, line 32, after "and", insert "Class 1".

On page 5, line 5, strike out ", in whichever of the base periods in"; and strike out line 6, and insert a period.

Amendment No. 7 On page 5, line 37, after "and", insert "pool",

On page 5, line 43, after "and", insert "pool".

Amendment No. 9

to regulations adopted, after strike out "pursuant On page 6, lines 12 and 13, strike ou public hearings," and insert "in a manner".

Amendment No. 10 On page 6, line 46, strike out "2", and insert "5",

On page 7, line 3, after "average", insert "Class 1".

#### Amendment No. 12

ASSEMBLY JOURNAL

out "bylaws", and insert "articles of incorporation, On page 7, line 27, strike our bylaws, or marketing agreements?" strike 7. line 27.

#### Amendment No. 13

to 20, On page 8, line 17, strike out "It is the intention", and strike out lines 18 inclusive.

#### Amendment No. 14

Amendment No. 15

On page 8, line 27, strike out "regional"

On page 8, line 30, strike out "regional"

#### out "total pool quota", and insert "total production Amendment No. 16 On page 8, line 49, strike bases and total pool quotas".

strike out "relating to the use of fluid milk by"; and on page On page 8, line 52, strike out "relat line 1, strike out "the distributor as"

#### Amendment No. 18

"The director may amend the plan, after notice and public hearing has been given in the same manner as is provided in Article 13 (commencing with Section 62181) of Chapter 2 of this part for stabilization and marketing plans, if he finds that the amendment is necessary to effectuate the purposes of this chapter. After the hearing, the director upon his own motion may make nonsubstantive amendments to the plan. The director may make substantive amendments to the plan. The director and make substantive amendments to the proposed amendments at a referendum conducted in the same manner and in the same number as provided for the referendum approving On page 10, between lines 16 and 17, insert the pooling plan.

#### Amendment No. 19

On page 10, between lines 28 and 29, insert

"The director shall submit the termination of the plan on a statewide basis in

"referendum conducted in the same manner as provided for initial approval of
such plan if, after notice and public hearing has been given in the same manner as
is provided in Article 13 (commencing with Section 62181) of Chapter 2 of this
part for stabilization and marketing plans, he finds that a substantial question exists
as to whether or not producers desire the plan to continue and shall submit the
plan for termination upon receipt of a petition requesting termination signed by
producers representing not less than 25 percent of the total number of all producers
and not less than 25 percent of the total production of all producers
he terminated it termination is favored by the same percentage of producers producing the same amount of fluid milk as required to initiate the plan.

#### Amendment No. 20

On page 11, line 26, strike out ". Producer-distributors", and insert "or producer-distributors".

#### Amendment No. 21

or any On page 11, line 36, strike out ", certified milk, or", and insert "per day, such producer of certified milk, or any such producer of".

#### Amendment No. 🖭

On page 11, line 42, strike out "producer", and insert "pooling"

#### Amendment No. 23

strike out lines 39 to 52, inclusive, and on page 13, strike out lines On page 12, s to 6, inclusive.

### Senate Amendments of July 21,

On page 7, line 48, of the printed bill, as amended in Senate July 14, 1967, after "fund", insert "for fluid milk received". Amendment No. 1

ASSEMBLY JOURNAL

Amendment No. 1

On page 13, of the printed bill, as amended in Senate July 14, 1967, after line This chapter shall be known as the Gonsalves Milk Pooling Act.

Senate  $^{\mathrm{the}}$ amendments to Assembly Bill No. 910 by the following vote: the Assembly concurred in and was called, The roll

AYES—Bear, Bee, Belotti, Beverly, Brathwaite, Briggs, Burton, Chappie, Collier, Crandall, Cullen, Davis, Dunlap, Elliott, Fenton, Foran, Gonsalves, Hayes, Ray E. Johnson, Ketchum, MacDonald, McGee, Milias, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Powers, Priolo, Quimby, Ralph, Roberti, Sieroty, Veysey, Wakefield, Warren, and Mr. Speaker—42.

Assembly Bill No. 910 ordered enrolled.

## REQUEST FOR UNANIMOUS CONSENT TO TEMPORARILY SUSPEND THE RULES

Mr. Chappie was granted unanimous consent that the Assembly Rules Senate Bill No. 1411 for hearing in the Committee on Social Welfare on Thursday, July be temporarily suspended for the purpose of setting

## At 9:25 a.m., Chief Clerk James D. Driscoll at the Desk

#### CONSIDERATION OF DAILY FILE (RESUMED) THIRD READING OF SENATE BILLS

Senate Bill No. 1366—An act to amend Section 8276 and to repeal Section 8277 of the Fish and Game Code, relating to crabs.

Bill read third time, and presented by Mr. Belotti.

Bill passed by the following vote:

AYES—Badham, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Burke, Chappie, Collier, Conrad, Cory, Crandall, Cullen, Davis, Deddeh, Dunlap, Elliott, Fenton, Foran, Gonsalves, Hayes, Ray E. Johnson, Ketchum, Knox, MacDonald, McGee, McMillan, Milias, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Ralph, Roberti, Russell, Stacey, Veysey, Wake-All, March, and Mr. Speaker—49.

NOES-Quimby-1.

Bill ordered transmitted to the Senate.

Senate Bill. No. 235—An act to amend Section 10651 of the Education Code, relating to readers for blind students.

Bill read third time, and presented by Mr. Barnes.

Bill passed by the following vote:

AYES—Badham, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Briggs, Burke, Burton, Chappie, Collier, Conrad, Cory, Crandall, Cullen, Davis, Deddeh, Dunlap, Elliott, Fenton, Foran, Gonsalves, Hayes, Ray E. Johnson, Ketchum, Knox, MacDonald, McGee, Milias, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Sieroty, Stacey, Veysey, Wakefield, and Mr. Speaker—49.

Bill ordered transmitted to the Senate.

Senate Bill No. 1357-An act to add Section 20019.05 to the Government Code, relating to local safety members.

Bill read third time, and presented by Mr. Murphy

The roll was called

#### Call of the Assembly

Pending the announcement of the vote, Mr. Murphy moved a call of the Assembly.

Mr. Fenton seconded the motion.

Motion carried. Time, 9:30 a.m.

The Speaker pro Tempore directed the Sergeant at Arms to close the doors, and to bring in the absent Members.

#### TEMPORARY SUSPENSION OF ASSEMBLY RULES PROCEEDINGS UNDER CALL OF THE ASSEMBLY BY UNANIMOUS CONSENT

Mr. Badham was granted unanimous consent that the Assembly Rules be temporarily suspended for the purpose of placing a call of the Assembly on any matter before the House.

#### THIRD READING OF SENATE BILLS (RESUMED) CONSIDERATION OF DAILY FILE (RESUMED)

Senate Bill No. 964—An act to amend Section 25258 of the Vehicle Code, and to add Section 830.9 to the Government Code, relating to emergency motor vehicles.

Bill read third time, and presented by Mr. Foran

Bill passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Briggs, Britschgi, Brown, Burke, Burton, Chappie, Collier, Conrad, Cory, Crandall, Cullen, Davis, Deddeh, Dunlap, Elliott, Fenton, Foran, Gonsalves, Bill Greene, Hayes, Harvey Johnson, Ray E. Johnson, Katehum, Knox, MacDonald, McGee, McMillan, Millas, Mobley, Moorhead, Moretti, Mulford, Negri, Pattee, Powers, Priolo, Quimby, Roberti, Russell, Stacey, Townsend, Veysey, Wakefield, and Mr. Speaker—52.

Bill ordered transmitted to the Senate.

Senate Bill No. 1004—An act to amend Section 6062 of the Business and Professions Code, relating to attorneys.

Bill read third time, and presented by Mr. Bagley

Bill passed by the following vote:

AYES—Badham, Bagley, Bee, Belotti, Beverly, Biddle, Briggs, Britschgi, Brown, Burton, Chappie, Collier, Conrad, Cory, Crandall, Cullen, Davis, Deddeh, Dent, Dunlap, Elliott, Fenton, Foran, Gonsalves, Bill Greene, Harvey Johnson, Ray E. Johnson, Kerchum, Knox, MacDonald, McGee, McMillan, Meyers, Millias, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Quimby, Balph, Roberti, Russell, Sieroty, Stacey, Townsend, Veyesy, Warren, and Mr. Speaker—53. NOES—Bear, Burke, Hayes, and Wakefield—4.

Bill ordered transmitted to the Senate.

Senate Bill No. 240—An act to amend Section 2934a of the Civil Sode, relating to trustees of trust deeds.

Bill read third time, and presented by Mr. Sieroty.

Bill passed by the following vote:

AYES—Badham, Bagley, Bear, Bee, Belotti, Beverly, Biddle, Briggs, Britschgi, Brown, Burke, Burton, Chappie, Collier, Conrad, Cory, Crandall, Cullen, Davis, Deddeh, Dent, Dunlap, Elliott, Fenton, Foran, Gonsalves, Bill Greene, Hayes, Har-

ASSEMBLY JOURNAL July 25, 1967 vey Johnson, Ketchum, Knox, MacDonald, McGee, McMillan, Meyers, Milias, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Priolo, Quimby, Ralph, Roberti, Russell, Sieroty, Stacey, Thomas, Townsend, Wakefield, Warren, and Mr. Speaker-

NOES-None.

Bill ordered transmitted to the Senate.

Senate Joint Resolution No. 14—Relative to military status of law enforcement personnel.

Resolution read, and presented by Mr. Mulford.

Resolution adopted by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly Biddle, Brathwaite, Briggs, Britschgi, Burke, Chappie, Collier, Conrad, Crandall, Davis, Deddeh, Dent, Duntang, Fenton, Foran, Gonsalves, Hayes, Harvey Johnson, Ray E. Johnson, Ketchum, Knox, MacDonald, McMillas, Molyers, Millas, Mobley, Morchead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Sieroty, Stacey, Thomas, Veysey, Wakefield, Warren, and Mr.

NOES-None.

Resolution ordered transmitted to the Senate.

Senate Bill No. 889—An act to amend Section 16510 of the Education Code; relating to school buses

Bill read third time, and presented by Mr. Priolo.

Bill passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Chappie, Collier, Conrad, Crandall, Cullen, Davis, Deddeh, Dent, Dunlap, Elliott, Fenton, Foran, Gonsalves, Hayes, Harvey Johnson, Ray E. Johnson, Retchum, MacDonald, McGee, McMillian, Meyers, Milias, Mobley, Moorhead, Moretti, Muford, Murphy, Pattee, Porter, Powers, Priolo, Quimby, Roberti, Russell, Ryan, Schabarum, Sieroty, Stacey, Thomas, Veysey, Wakefield, Warren, and Mr. Speaker—57.

NOES.

Bill ordered transmitted to the Senate.

Senate Bill No. 1061—An act to amend Sections 23057 and 23755 of the Education Code, relating to public higher education.

Bill read third time.

Request for Unanimous Consent to Temporarily Suspend the Rules

Mr. Veysey was granted unanimous consent that the Rules be emporarily suspended for the purpose of permitting him to offer amendments to Senate Bill No. 1061 which add a total of more than 25 words to the bill, without having copies of the amendments placed upon the Members' desks

Motion to Amend

Mr. Veysey moved the adoption of the following amendments

Amendment No. 1

bill, as amended in Assembly June 16, 1967, strike but t "tioned in this state on the residence determination insert On page 2 of the printed lines 12 and 13, and insert late, and".

Amendment No. R

strike out "opening day", and insert "residence determinaline 18, જાં On page tion date".

#### Amendment No. 3

On page 2, after line 26, insert "SEC. 3. Section 2 of this act shall become operative for semesters and quarters on and after January 1, 1968."

Amendments read, and adopted.

Bill ordered reprinted, and to be returned to third reading.

Senate Bill No. 838—An act to amend Section 201 of the Education Code, relating to the Superintendent of Public Instruction.

Bill read third time, and presented by Mr. Porter.

## Senate Bill No. 838 Passed and Retained

5 consent, Senate Bill No. 838 was passed on file, retain its place on file unanimous

## Hon. Joe A. Gonsalves Presiding

At 9:50 a.m., Hon. Joe A. Gonsalves, 66th District, presiding.

Senate Bill No. 414—An act to amend Section 65402 of the Government Code and Sections 1701 and 1850 of the Streets an Highways Code, relating to highways.

Bill read third time, and presented by Mrs. Brathwaite.

Bill passed by the following vote:

AYES—Badham, Bagley, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown. Burke, Burton, Chappie, Collier, Conrad, Cory, Crandall, Cullen, Davis, Deddeh, Dent, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Hayes, Harvey Johnson, Ray E. Johnson, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Milias, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Veysey, Wakefield, Warren, and Mr. Speaker—65. NOES-None.

Bill ordered transmitted to the Senate.

Senate Bill No. 1217—An act to amend Sections 35712 and 35714 of the Vehicle Code, relating to use of public roads by commercial vehicles. Bill read third time, and presented by Mr. Bee.

Bill passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Chappie, Collier, Conrad, Cory, Crandall, Cullen, Davis, Deddeh, Dent, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Hayes, Harvey Johnson, Ray E. Johnson, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Milias, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Priolo, Quimby, Rajph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Veysey, Wakefield, Warren, Wilson, and Mr. Speaker—66.

NOES-None.

Bill ordered transmitted to the Senate.

At 9:54 a.m., Hon. Carlos Bee, 13th District, presiding. Speaker pro Tempore Presiding

Senate Bill No. 1299—An act to add Section 21207 to the Vehicle Code, relating to bicycle paths upon highways.

Bill read third time, and presented by Mr. Ray E. Johnson.

ASSEMBLY JOURNAL

5577

Motion to Re-refer Senate Bill No. 1275 to Committee

Mr. Biddle moved that Senate Bill No. 1299 be re-referred to the Committee on Criminal Procedure

Motion lost by the following vote:

AYES—Barnes, Bear, Bee, Biddle, Burton, Cory, Davis, Bill Greene, Knox, McGee, Moorhead, Murphy, Quimby, Sieroty, Warren, and Zenovich—16.
NOES—Badham, Belotti, Beverly, Briggs, Britschgi, Brown, Burke, Campbell, Chappie, Collier, Conrad, Cullen, Deddeh, Dent, Fenton, Fong, Foran, Gonsalves, Hayes, Harvey Johnson, Ray E. Johnson, Ketchum, McMillan, Meyers, Mobley, Mulford, Negri, Powers, Priolo, Roberti, Russell, Schabarum, Veysey, Wakefield, and Wilson—35.

Demand for Previous Question

Messrs. Britschgi, Campbell, Belotti, Russell, and Chappie demanded the previous question. Demand sustained.

The question being on the passage of the bill.

The roll was called

Call of the Assembly

Pending the announcement of the vote, Mr. Ray E. Johnson moved a call of the Assembly.

Mr. Veysey seconded the motion.

Motion carried. Time, 10:08 a.m.

The Speaker pro Tempore directed the Sergeant at Arms to close the doors, and to bring in the absent Members.

#### PROCEEDINGS UNDER CALL OF THE ASSEMBLY BY UNANIMOUS CONSENT

# TEMPORARY SUSPENSION OF ASSEMBLY RULES

Shoemaker was granted unanimous consent that the Assembly Rules be temporarily suspended for the purpose of placing a call of the Assembly on any matter before the House,

#### THIRD READING OF SENATE BILLS (RESUMED) CONSIDERATION OF DAILY FILE (RESUMED)

Senate Bill No. 1377—An act to add Part 10 (commencing with Section 98000) to Division 10 of the Public Utilities Code, relating to the Santa Cruz Metropolitan Transit District.

Bill read third time, and presented by Mr. Murphy.

Bill passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear. Bee, Belotti, Beverly, Biddle, Brath-Malle, Briggs, Britschgi, Brown, Burton, Campbell, Chappie, Collier, Cory, Crandall Cullen, Davis, Deddeh, Dent, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Ball Greene, Leroy F. Greeñe, Harves, Johnson, Ray E. Johnson, Ketchum, Kaox, Lanterman, MacDonald, McGee, McMillan, Meyers, Millas, Mobley, Moor-Band, Moretti, Mulford, Murphy, Pattee, Porter, Powers, Priolo, Quimby, Roberti, Enibedl, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vas-Narins, Neyery, Wakefield, Warren, and Mr. Speaker—65. NOES None.

Bill ordered transmitted to the Senate.

ಕ ಕ add Section 5375.1 to, the Streets and Highways Code, relating Senate Bill No. 1444—An act to amend Section 5374.1 of, special assessments.

Bill read third time, and presented by Mr. Roberti.

2-AJ 325

July 25, 1967

5578

## Bill passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Cullen, Davis, Deddeh, Dent, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Harvey Johnson, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Majers, Milias, Milias, Milier, Mobley, Moorhead, Moretti, Mulford, Murphy, Pattee, Porter, Powers, Priolo, Quimby, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Thomas, Townsend, Vasconcellos, Veysey, Wakefield, Warren, Wilson, Zenovich, and Mr. Speaker—66.

Bill ordered transmitted to the Senate.

Senate Bill No. 538—An act to amend Section 639 of, and to add Section 639a to, the Penal Code, relating to credit.

Bill read third time, and presented by Mr. Biddle.

Bill passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Brithschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Cullen, Davis, Deddeh, Dent, Dunlap, Biliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Hayes, Harvey Johnson, Ray E. Johnson, Katchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Milias, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Pattee, Porter, Powers, Priolo, Quimby, Roberti, Russell, Ryam, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veysey, Wakefield, Warren, Wilson, Zenovich, and Mr. Speaker—69.

Bill ordered transmitted to the Senate.

Senate Bill No. 820—An act to amend Section 25 of the Civil Code, relating to minors

Bill read third time, and presented by Mr. Bagley.

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Chappie, Collier, Cory, Crandall, Crown, Cullen, Deddedh, Dent, Dunlay, Fenton, Fong, Foran, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Ray B. Johnson, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Milias, Miller, Mobley, Moorhead, Moortti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Roberti, Russell, Ryan, Schabarum Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veysey, NOES—Davis—1. Bill passed by the following vote:

Bill ordered transmitted to the Senate.

Senate Bill No. 732-An act to amend Section 70 of the Civil Code, relating to marriage.

Bill read third time, and presented by Mr. Sieroty.

Bill passed by the following vote:

AYES—Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burton, Chappie, Collier, Conrad, Cory, Crandall, Grown, Gullen, Davis, Deddeh, Dent, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Harvey Johnson, Ray E. Johnson, Ketchum, Knox, MacDonald, McGee, McMillan, Meyers, Millar, Molley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Townsend, Vasconcellos, Veysey, Warren, Wilson, Zenovich, and Mr. Speaker—65. NOES-None

Bill ordered transmitted to the Senate.

Senate Bill No. 1321-An act to amend Section 75060 of the Government Code, relating to judicial retirement.

Bill read third time, and presented by Mr. Murphy.

Bill passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Chappie, Collier, Conrad, Cory, Grandall, Crown, Cullen, Davis, Deddeh, Dent, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Hayes, Harvey Johnson, Ray E. Johnson, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Millias, Miller, Mobley, Moorhad, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, "Veysey, Veysey, Warren, Wilson, Z'berg, Zenovich, and Mr. NOES—None. Karper, Townsend, v

Bill ordered transmitted to the Senate.

Senate Bill No. 687—An act to add Section 19584.2 to the Education Code, relating to state school building aid.

Bill read third time, and presented by Mr. Crandall

Bill passed by the following vote:

AYES—Bagley, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Chappie, Collier, Cory, Crandall, Crown, Cullen, Davis, Beddeh, Dent, Dunlah, Elliotti, Fenton, Foog, Foran, Gonsalves, Bill Greene, Leroy E. Greene, Harvey Johnson, Ray E. Johnson, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Millias, Miller, Mobley, Moorhead, Moretti, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Rayn, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veyesy, Warren, Wilson, Zberg, Zenovich, and Mr. Speaker—68.

Bill ordered transmitted to the Senate.

Senate Bill No. 179—An act to amend Section 6515.1 of the Health and Safety Code, relating to sanitary districts.

Bill read third time, and presented by Mr. Knox.

Bill passed by the following vote:

AYES—Badham, Bagley, Bear, Bee, Belotti, Beverly, Brathwaite, Briggs, Britschgi, Brown, Burke, Burten, Chappie, Collier, Conrad, Cory, Crandall, Crown, Gullen, Davis, Dent, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Harvey Johnson, Ray E. Johnson, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Milias, Miller, Mobley, Moorhead, Moretti, Multord, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Sheemsker, Sierciy, Thomas, Townsend, Vasconcellos, Veyey, Wayren, Wilson, Z'berg, Zenovich, and Mr. Speaker—67. Veysey, W

-None.

Bill ordered transmitted to the Senate.

Senate Bill No. 180-An act to amend Section 6489 of the Health and Safety Code, relating to compensation of sanitary district mem-

Bill read third time, and presented by Mr. Knox.

Bill passed by the following vote:

AYES—Bagley, Bee, Belotti, Beverly, Britschgi, Brown, Burke, Burton, Chappie, Collier, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Dunlap, Elliott, Fentor, Fong, Gonsalves, Leroy F. Greene, Harvey Johnson, Ray E. Johnson, Ketchum, Knör, Lanterman, MacDonald, McGee, McMillan, Meyers, Milias, Miller, Mobley, Moretti, Mulford, Murphy, Negri, Patter, Porter, Powers, Quimby, Ralph, Roberti, Bussell, Schabarum, Shoemaker, Sieroty, Thomas, Townsend, Vasconcellos, Veysey, Warren, Zberg, Zenovich, and Mr. Speaker—57.

NOES—Bear, Briggs, Hayes, Moorhead, and Priolo—5.

Bill ordered transmitted to the Senate.

ASSEMBLY JOÙRNAL

Senate Bill No. 181-An act to amend Section 6515.2 of the Health and Safety Code, relating to notice inviting bids.

ASSEMBLY JOURNAL

Bill read third time, and presented by Mr. Knox.

Bill passed by the following vote:

AYES—Bagley, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Chappie, Cory, Crandall, Crown, Cullen, Deddeh, Dent, Dunlap, Elliott, Fenton, Fong, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Ray E. Johnson, Karabian, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Miller, Molley, Moorhead, Moretti, Mulford, Negri, Pattee, Porter, Powers, Priloo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Vasconcellos, Veysey, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—65.

NOES-Murphy-1.

Bill ordered transmitted to the Senate.

An act to amend Section 53635 of the Government Code, relating to funds of local agencies. Senate Bill No. 578–

Bill read third time, and presented by Mr. Burke.

Bill passed by the following vote:

AYES—Bagley, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Brithschgi, Brown, Burke, Burton, Chappie, Collier, Crandall, Crown, Cullen, Deddeh, Dent, Dunlap, Elliott, Fenton, Fong, Gonsalves, Bill Greene Leroy F. Greene, Hayes, Harvey Johnson, Ray E. Johnson, Karabian, Karoy, Lanterman, MacDonald, McGee, McMillan, Meyers, Millar, Mobley, Moorhead, Moretti, Mulford, Murphy, Pattee, Porter, Powers, Priolo, Quimby, Roberti, Russell, Ryan, Schabarum, Shoemaker, Steroty, Stacey, Thomas, Veysey, Warren, Wilson, Zherg, Zenovich, and Mr. Speaker—63.

Bill ordered transmitted to the Senate.

#### ANNOUNCEMENTS

member will be permitted to have his vote change or added after the Speaker pro Tempore Bee announced that starting tomorrow, no final announcement of the vote, but he will be permitted to submit an explanation of how he would have voted and have it printed in the Journa At 10:30 a.m. today, July 25, 1967, Speaker pro Tempore Carlos Bee

made the following announcement:

ing other legislative business may no longer make verbal motions to be Members off the Assembly Floor appearing in committee or conductadded to the roll, with which I concur.

JESSE M. UNRUH

#### THIRD READING OF SENATE BILLS (RESUMED) CONSIDERATION OF DAILY FILE (RESUMED)

Senate Bill No. 897—An act to amend Section 24049 of the Business and Professions Code, relating to alcoholic beverages.

Bill read third time, and presented by Mr. Powers.

Bill passed by the following vote:

AYES—Badham, Bagley, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Chappie, Collier, Conrad, Cory, Crown, Cullen, Deddeh, Dent, Dunlap, Elliotti, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Harvey Johnson, Ray E. Johnson, Karabian, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Milias, Miller, Mobley, Moorhead, Moretti, Mulford, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veysey, Warren, Wilson, Z'berg, and Mr. Speaker—66.

Bill ordered transmitted to the Senate.

Hon. Winfield A. Shoemaker Presiding

At 10:32 p.m., Hon. Winfield A. Shoemaker, 36th District, presiding.

CALL OF THE ASSEMBLY DISPENSED WITH ON SENATE BILL NO. 1357

At 10:33 a.m., on motion of Mr. Murphy, further proceedings under the call of the Assembly were dispensed with

The names of the absentees were called, and Senate Bill No. 1357 passed by the following vote:

AYES—Bagley, Barnes, Bear, Bee, Beverly, Brown, Burton, Chappie, Collier, Grandall, Crown, Cullen, Davis, Deddeh, Dunlap, Elliott, Fenton, Foran, Gongaires, Bill Greene, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Miller, Moorhead, Moretti, Mulford, Murphy, Pattee, Porter, Powers, Guimby, Ralph, Roberti, Shoemaker, Sieroty, Thomas, Warren, Zberg, Zenovich, and Mr. Speaker—45.

NOES—Belotti, Biddle, Briggs, Britschgi, Burke, Hayes, Ketchum, Vasconcellos,

and Wakefield—9

Bill ordered transmitted to the Senate.

#### THIRD READING OF SENATE BILLS (RESUMED) CONSIDERATION OF DAILY FILE (RESUMED)

Senate Bill No. 1049—An act to add Article 18 (commencing with Section 74040) to Chapter 10 of Title 8 of the Government Code, relating to municipal courts.

Bill read third time, and presented by Mr. Biddle.

Bill passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Chappie, Collier, Conrad, Cory, Crandall, Cram, Cullen, Deddeh, Denf, Dunlap, Eliott, Fenton, Fong, Foran, Gonsalves, Jeroy F. Greene, Hayes, Karabian, Ketchum, Knox, Lanterman, MacDonald, McPer, McMillan, Meyers, Milias, Miller, Mobby, Moorhead, Moretti, Mulford, Mur. Negri, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schamaran, Shoemaker, Sieroty, Stacey, Thomas, Vasconcellos, Veysey, Warren, Z'berg, Nob.—None.

Bill ordered transmitted to the Senate.

Sonste Bill No. 1223—An act to amend Section 73433.5 of the Government Code, relating to municipal courts.

Bill read third time, and presented by Mr. Stacey.

Bill passed by the following vote:

ATES Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Dunlay, Elliott, Fenton, Fong,

ASSEMBLY JOURNAL

Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Ray E. Johnson, Karabian, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, McGres, Milias, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veysey, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—74.

NOES-None.

Bill ordered transmitted to the Senate.

Senate Concurrent Resolution No. 49-Relative to the holding of United Nations Conference on Geothermal Resources in California.

Resolution read, and presented by Mr. Z'berg.

Resolution adopted.

Resolution ordered transmitted to the Senate.

Senate Bill No. 253-An act to add a chapter heading immediately preceding Section 1237 of, and to add Chapter 2 (commencing with Section 1272.01) to Title 7 of Part 3 of, the Code of Civil Procedure, relating to eminent domain.

Bill read third time, and presented by Mr. Bagley

Bill passed by the following vote:

AYES—Badham, Bagley, Bear, Belotti, Beverly, Biddle, Briggs, Britschgi, Brown, Burke, Burton, Chappie, Collier, Conrad, Cory, Crandall, Cullen, Deddeh, Dent, Dunlap, Elliott, Fenton, Foran, Gonsalves, Leroy F. Greene, Hayes, Ray E. Johnson, Karabian, Lanterman, MacDonald, McGee, McMillan, Mcyers, Millar, Mobley, Moorhad, Moretti, Negri, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veysey, Warren, Wilson, Z'berg, and Zenovich—69.

NOES-Mulford and Murphy-2.

Bill ordered transmitted to the Senate.

## Speaker pro Tempore Presiding

At 10:44 a.m., Hon. Carlos Bee, 13th District, presiding.

Senate Bill No. 1393-An act relating to school district taxation, declaring the urgency thereof, to take effect immediately

Bill read third time, and presented by Mr. Unruh

#### Urgency Clause

Urgency clause read, and adopted by the following vote:

AYES—Badham, Bagley, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Chappie, Collier, Conrad, Crandall, Cullen, Dedde, Dont, Dunlap, Biliott, Fenton, Fong: Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Ray B. Johnson, Karabian, Lanterman, MacDonald, McMillan, Meyers, Millas, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veysey, Warren, Wilson, Zberg, NOES—Cory—1.

The question being on the passage of the bill

Bill passed by the following vote:

AYES—Badham, Bagley, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Chappie, Collier, Conrad, Crandall, Cullen, Deddeh, Dent, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Ray E. Johnson, Karabian, Lanterman, MacDonald, McMillan,

### ASSEMBLY JOURNAL

Meyers, Milias, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veysey, Warren, Wilson, Z'berg, Sieroty, Stacey, Thomas, T Zenovich, and Mr. Speaker-NOES—Cory—1.

Bill ordered transmitted to the Senate.

Senate Bill No. 1447.—An act to amend Section 232 of the Civil Code, relating to child custody.

Bill read third time, and presented by Mr. McGee.

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Bill passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Chappie, Collier, Conrad, Cory, Crandall, Cullen, Deddeh, Dent, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Ray E. Johnson, Karabian, Lanterman, MacDonald, McGee, McMillan, Meyers, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Porter, Powers, Priolo, Quimby, Roberti, Russell, Ryan, Schabarum, Shoemaker, Siercy, Stacey, Thomas, Townsend, Vasconcellos, Veysey, Warren, Zenovich, and Mr. Speaker—63. Mr. Speaker—63 NOES—None.

Bill ordered transmitted to the Senate.

# CALL OF THE ASSEMBLY DISPENSED WITH ON SENATE BILL NO. 1299

At 10:47 a.m., on motion of Mr. Ray E. Johnson further proceedings under the call of the Assembly were dispensed with. The names of the absentees were called, and Senate Bill No. 1299 passed by the following vote: AXES—Badham, Belotti, Beverly, Brathwaite, Briggs, Brithschgi, Brown, Burke, Campbell, Chappie, Collier, Conrad, Crandall, Cullen, Beddeh, Dent, Fong, Foran, Gensalves, Leroy F. Greene, Hayes, Ray B. Johnson, Lanterman, McMillan, Meyers, Milias, Mobley, Moorbead, Moretti, Mulford, Murphy, Pattee, Porter, Powers, Priolo, Ralph, Russell, Ryan, Schabarum, Thomas, Townsend, Vasconcellos, Veysey, and

Cory, Davis, Dunlap, Elliott, Knox, McGee, Miller, Negri, Warren, Zenovich, and Mr. -Bagley, Barnes, Bear, Biddle, Burton, 3ill Greene, Harvey Johnson, Ketchum, Roberti, Shoemaker, Sieroty, Stacey, Fenton, Bill NOES Quimby. Speaker

Bill ordered transmitted to the Senate.

#### ANNOUNCEMENTS

Speaker pro Tempore Bee announced that all items passed temporarily earlier this day on the Senate third reading file would be passed on file, with the exception of those items to be presented by Members who were excused on this day.

#### Items Passed on File

Pursuant to the above announcement, the following items were this day passed on file:

frem 60—Senate Bill No.

Item 62—Senate Bill No.

Item 64—Senate Bill No. 1181

ftem 67—Senate Bill No.

Item 68—Senate Bill No. 1443

July 25, 1967

No. 528. Senate Bill Senate Bill 84 Item ' tem

Senate Bill No. 635. tem 86-

Senate Bill No. 963. Senate Bill No. 288. 89 [tem 92tem

Senate Bill No. 95. tem 98-

Senate Bill No. 1298. -Senate Bill No. 1151 tem 100-

Senate Bill No. 1248. [tem 106tem 104

## CONSIDERATION OF DAILY FILE (RESUMED)

#### CONSIDERATION OF SENATE AMENDMENTS UNFINISHED BUSINESS

Assembly Bill No. 168—An act to add Chapter 9.7 (commencing with Section 6941) to Division 6 of the Education Code, relating to handicapped children.

The question being: Shall the Assembly concur in the following Senate amendment to Assembly Bill No. 168  $\c !$ 

#### Amendment No.

On page 2, line 8, of the printed bill, as amended in Assembly February 27, 1967, strike out "(c) or (d)", and insert "or (c)".

The roll was called, and the Assembly concurred in the Senate amendment to Assembly Bill No. 168 by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Briggs, Britschgi, Brown, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Cullen, Davis, Deddeh, Dent, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Ray E. Johnson, Karabian, Ketchum, Knox, Lanterman, McGee, Meyers, Milias, Miller, Mobley, Morhead, Moretti, Mulford, Murphy, Negri, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veyers, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—67. NOES-None.

Assembly Bill No. 168 ordered enrolled.

Section 18000) and Part 2.1 (commencing with Section 18200) to Division 13 of, and to repeal Part 2 (commencing with Section 18000) Assembly Bill No. 250—An act to add Part 2 (commencing with of Division 13 of, the Health and Safety Code, relating to mobilehomes and mobilehome parks

The question being: Shall the Assembly concur in the following Senate amendments to Assembly Bill No. 250?

#### Senate Amendments of June 5, 1967 Amendment No. 1

On page 4, lines 49 and 50, of the printed bill, **s** amended in Assembly May 9, 1967, strike out "The California Highway Patrol shall enforce the provisions of Section 18053."

Amendment No. 🗈

page 6, strike out lines 31 to 35, inclusive.

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#### Senate Amendments of June 13, 1967 Set No. 1

Amendment No. 1

June 5, 1967, insert "(e) This part does not apply to electric, gas or water facilities owned, operated, and maintained by mubblic utility." as amended in Senate On page 12, between lines 28 and 29, of the printed bill, June 5, mar.

#### Set No. 2

ASSEMBLY JOURNAL

Amendment No. 1

in Senate June 5, 1967, the printed bill, as amended oţ On page 4, line 51, strike out "other".

Amendment No. 2

On page 5, line 24, after "mobilehome", insert "to which there is attached or established for use of the occupant of the mobilehome any mobilehome".

The roll was called, and the Assembly concurred in the Senate amendments to Assembly Bill No. 250 by the following vote: AYES—Badham, Bagley, Barnes, Belotti, Beverly, Biddle, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Cullen, Davis, Deddeh, Dent, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Ray E. Johnson, Karebian, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Milias, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veysey, Warren, Wilson, Z'berg, and Zenovich—68.

Assembly Bill No. 250 ordered enrolled.

NOES-None.

Assembly Bill No. 1359—An act to amend Section 441 of, and to repeal Section 450 of, the Revenue and Taxation Code, relating to property taxation. in the following concur Senate amendments to Assembly Bill No. 1359? The question being: Shall the Assembly

## Senate Amendments of June 5, 1967

Amendment No. 1

On page 1, line 15, of the printed bill, as amended in Assembly May 12, 1967, after "filed", insert ", annually."

Amendment No. 2

On page 2, lines 1 and 2, strike out ", annually, and within such time as the assessor may appoint".

## Senate Amendments of June 28, 1967

Amendment No. 1

In line 1 of the title of the printed bill, as amended in Senate June 5, 1967, after of", insert ", and to repeal Section 450 of".

#### Amendment No. 2

On page 2, after line 24, insert

The assessee shall fill out the property statement and return it Section 450 of the Revenue and Taxation Code is repealed. to the assessor within an appointed time. SEC.

## Senate Amendments of June 30, 1967

Amendment No.

In lines 1 and 2 of the title of the printed bill, as amended in Senate June 28, 1967, strike out ", and to repeal Section 450 of,".

Amendment No. 2

On page 2, line 5, strike out ", annually".

On page 2, line 7, after "May", insert ", annually, and within such time um the Amendment No. 4 On

On page 2, strike out lines 28 and 29.

## Senate Amendments of July 7, 1967

ASSEMBLY JOURNAL

#### Amendment No. 1

in Senate June 30, 1967, printed bill, ns amended In line 1 of the title of the printed bill, == amended after the word "of", insert ", and to repeal Section 450 of;

#### Amendment No. 2

On page 2, line 5, after the word "filed", insert ", annually,".

#### Amendment No.

On page 2, line 7, after the word "May", insert a period, and strike out ", annually, and within such time as the

#### Amendment No. 4

On page 2, strike out line 8.

#### Amendment No. 5

On page 2, after line 30, insert

Section 450 of the Revenue and Taxation Code is repealed. The assessee shall fill out the property statement and return it to the assessor within an appointed time. "SEC.

## Senate Amendments of July 19, 1967

Amendment No. 1

On page 1, line 3, of the printed bill, as amended in Senate July 7, 1967, after 'waning', insert "taxable".

### Amendment No.

## On page 2, line 10, strike out ", annually,".

as the time On page 2, line 12, after "May", insert ", annually, and within such assessor may appoint".

Amendment No. 3

#### Amendment No. 4

On page 2, between lines 13 and 14, insert

"If the assessor appoints a time other than the last Monday in May, it shall no earlier than April 1.

<u>8</u>

No late filing populty shall apply unless:

(1) The property statement is filed after April 1;

(2) The assessor has given notice by certified or registered mail no earlier than 15 days after the time appointed by the assessor; and

(3) The property statement has not been filed with the assessor within 15 days following the date of receipt of such notice."

The roll was called, and the Assembly concurred in the Senate amend-

Ronald Reagan-1996

ments to Assembly Bill No. 1359 by the following vote:

AYES—Badham, Bagley, Barnes, Bee. Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Karabian, Ketchum, Knox, Lanterman, McGee, McMillan, Meyers, Millar, Muller, Mobley, Moerti, Mulicot, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—69. NOES-None.

Assembly Bill No. 1359 ordered enrolled.

Assembly Bill No. 1450—An act to add Section 11710.1 to the hiele Code, relating to bonds of motor vehicle dealers.

The question being: Shall the Assembly concur in the following Senate amendment to Assembly Bill No. 1450?

On page 1, line 6, of the printed bill, after "evidence", insert ", together with an assignment to the director,". Amendment No. 1

#### July 25, 1967

#### ASSEMBLY JOURNAL

The roll was called, and the Assembly concurred in the Senate amendment to Assembly Bill No. 1450 by the following vote: AYES—Badham, Bagley, Barnes, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Harvey Johnson, Karabian, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Millar, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter. Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—70. NOES

Assembly Bill No. 1450 ordered enrolled.

Assembly Bill No. 1786—An act to amend Section 4089 of the Business and Professions Code, relating to pharmacists.

the following п. The question being: Shall the Assembly concur Senate amendment to Assembly Bill No. 1786?

#### Amendment No. 1

On page 1, line 5, of the printed bill, strike out "(d)".

The roll was called, and the Assembly concurred in the Senate amendment to Assembly Bill No. 1786 by the following vote: AYES—Badham, Bagley, Barnes, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Burke, Burton, Chappie, Collier, Conrad, Cory, Crandall, Crown, Davis, Deddeh, Dent, Dunlap, Elliott, Fenton, Foran, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Ray E. Johnson, Karabian, Krox, Lanterman, MacDonald, McGee, McMillan, Meyers, Milias, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Venenan, Veysey, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—68. NOEW.

Assembly Bill No. 1786 ordered enrolled.

Assembly Bill No. 1958—An act to amend Section 51201 of, and to \$ add Sections 51202 and 51203 to, the Government Code, relating the California Land Conservation Act of 1965.

in the following concur Senate amendments to Assembly Bill No. 1958? question being; Shall the Assembly The

#### Amendment No. 1

page 2, line 10 of the printed bill, as amended in Assembly June 13, 1967, "return", insert "on an annual basis". On after

#### Amendment No. P

line 29, strike out "addition, in". On page 2,

#### Amendment No. 3

On page 3, line 16, strike out "51251", and insert "51261".

Senate and the Assembly concurred in the amendments to Assembly Bill No. 1958 by the following vote: called, Was The roll

\*\*ATES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathratic, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Congraf, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Dunlap, Elliott, Fenton, Fongs, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Harvey Johnson, Ray E. Johnson, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Millas, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Pow-

5589

, Sieroty, Wilson, ers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Stacey, Thomas, Townsend, Vasconcellos, Veneman, Veysey, Warren, Z'berg, Zenovich, and Mr. Speaker—72.

NOES—None.

Assembly Bill No. 1958 ordered enrolled.

and 20888 of the Business and Professions Code, relating to marketing Assembly Bill No. 2139—An act to amend Sections 20866, of petroleum products. The question being: Shall the Assembly concur in the following Senate amendments to Assembly Bill No. 2139?

#### Amendment No. 1

out "and 20868", and insert In line 1 of the title of the printed bill, strike ", 20868 and 20888".

#### Amendment No.

In line 2 of the title, strike out "gasoline metering devices", and insert "marketing of petroleum products".

#### Amendment No. 3

On page 4, after line 6, insert

Section 20888 of the Business and Professions Code is amended to read

All words, letters, figures or numerals on the advertising medium referred to in this article which form or designate the brand name or the words "no brand" shall be of like color or tint, and all words, letters, figures or numerals designating or indicating the price gasoline or other motor vehicle fuel so offered for sale shall be of like color or tint, and all letters used in the word "gasoline" or the words "motor fuel" shall be of like color or tint." 20888.

Senate The roll was called, and the Assembly concurred in the amendments to Assembly Bill No. 2139 by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Briggs, Brown, Burke, Campbell, Chappie, Collier, Conrad, Cory, Grandall, Crown, Cullen, Davis, Deddeh, Dent, Luffy, Dunlap, Elliott, Fenton, Forza, Gonsalves, Bill Greene, Hayes, Harvey Johnson, Karabian, Ketchum, Knox, Lanterman, MacDonald, McHayes, McHillan, Meyers, Milias, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Schabarum, Shoemaker, Stacey, Thomas, Townsend, Vasconcellos, Veneman, Wilson, Z'berg, Zenovich, and Mr. Speaker—66.

Assembly Bill No. 2139 ordered enrolled.

Assembly Bill No. 2310—An act to add Chapter 7 (commencing with Section 460) to Division 1 of the Business and Professions Code, relating to persons authorized by the state to engage in a business, occupation, or profession.

The question being . Shall the Assembly concur in the following Senate amendments to Assembly Bill No. 2310?

#### Senate Amendments of June 21, 1967 Amendment No. 1

On page 1, line 11 of the printed bill, m amended in Assembly June 5, 1967, after "county", insert "or city and county".

ASSEMBLY JOURNAL July 25, 1967

#### Senate Amendments of June 27, 1967 Amendment No.

On page 2, line 5, of the printed bill, as amended in Senate June 21, 1967, after "purposes", insert "nor any city or county from levying a license tax solely for the purpose of covering the cost of regulation".

The roll was called and the Assembly concurred in the Senate amendments to Assembly Bill No. 2310 by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Cullen, Davis, Deddeh, Dent, Duffy, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Harvey Johnson, Ray E. Johnson, Karabian, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Milias, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Schabarum, Shoemaker, Stacey, Thomas, Vasconcellos, Veysey, Wilson, Z'berg, Zenovich, and Mr. Speaker—66.

Assembly Bill No. 2310 ordered enrolled.

## THIRD READING OF ASSEMBLY BILLS

Government Code, relating to the Meyers-Geddes State Employees' Assembly Bill No. 1226—An act to amend Section 22825 Hospital and Medical Care Act.

Bill read third time.

The roll was called.

Call of the Assembly

Pending the announcement of the vote, Mr. Meyers moved a call of the Assembly.

Mr. Badham seconded the motion.

Motion carried. Time, 11:10 a.m.

The Speaker pro Tempore directed the Sergeant at Arms to close the doors, and to bring in the absent Members.

Ronald Reagan-1997

#### TEMPORARY SUSPENSION OF ASSEMBLY RULES PROCEEDINGS UNDER CALL OF THE ASSEMBLY BY UNANIMOUS CONSENT

Mr. Badham was granted unanimous consent that the Assembly Rules be temporarily suspended for the purpose of placing a call of the Assembly on any matter before the House.

## Hon. Robert E. Badham Presiding

At 11:10 a.m., Hon. Robert E. Badham, 71st District, presiding.

### THIRD READING OF ASSEMBLY BILLS (RESUMED) CONSIDERATION OF DAILY FILE (RESUMED)

Assembly Bill No. 1262—An act to amend Sections 12651 and 13101 of the Welfare and Institutions Code, relating to aid to the blind.

Bill read third time, and passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Britschgi, Brown, Burton, Campbell, Chappie, Collier, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Duffy, Dunlap, Elliott, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Harvey Johnson, Ray E. Johnson, Ketchum, MacDonald, McMillan, Meyers, Miller, Moorhead, Moretti, Mulford, Murphy, Negri, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Shoemaker, Sieroty, Thomas, Townsend, Vasconcellos, Warren, Wilson, Zberg, and Zenovich—60.

NOES—Briggs, Burke, Conrad, Lanterman, and Wakefield—5.

### NTRODUCTION OF GUESTS

ASSEMBLY JOURNAL

former Member of the State Senate, of Vallejo, whereupon the Members of the Assembly joined in welcoming him on his visit to the Acting Speaker Badham introduced the Honorable Luther E. Assembly Chamber.

## REQUEST FOR UNANIMOUS CONSENT

Mr. Brown asked for unanimous consent that Assembly Bill No. 1283 be passed on file, and that the bill retain its place on file

Mr. Conrad withheld unanimous consent.

Assembly Bill No. 1283 ordered placed upon the inactive file.

### THIRD READING OF ASSEMBLY BILLS (RESUMED) CONSIDERATION OF DAILY FILE (RESUMED)

7, 409, 410, 411, 1328, 1334, 1336, 1377, 2707.2, 2737, and 3655 of the Unemployment Insurance Code, relating to unemployment in-Assembly Bill No. 1432—An act to amend Sections 401, 402,

Bill read third time, and passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Brigss, Britschgi, Brown, Burke, Chappie, Collier, Conrad, Cory, Crown, Cullen, Davis, Deddeh, Pent, Duffy, Dunlap, Billott, Fenton, Foogs, Foran, Gonsalves, Leroy F. Greene, Harvey Johnson, Karabian, Ketchum, Knox, MacDonald, McGee, McMillan, Meyers, Milias, Mobley, Moretti, Mulford, Murphy, Negri, Porter, Powers, Priolo, Ralph, Roberti, Russell, Ryan, Shoemaker, Sieroty, Staeey, Thomas, Townsend, Vasconcellos, Wakefield, Warren, Wilson, Ziberg, Zenovich, and Mr. Speaker—63.

NOES—Burton, Hayes, and Moorhead—3.

Bill ordered transmitted to the Senate.

Assembly Bill No. 1562—An act to add Section 14412 to the Education Code, relating to Teachers' Retirement System.

Bill read third time, and passed by the following vote:

AYES—Badham, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Crown, Cullien, Davis, Deddeh, Dent, Duffy, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Karabian, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Milias, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—70.

Bill ordered transmitted to the Senate.

## UNFINISHED BUSINESS (RESUMED)—BY UNANIMOUS CONSENT CONSIDERATION OF SENATE AMENDMENTS

Assembly Bill No. 850—An act to add Sections 71042.5 and 71042.6 to the Government Code, relating to publication in judicial districts.

question being: Shall the Assembly concur in the following Senate amendment to Assembly Bill No. 850? On page 2, line 2, of the printed bill, as amended in Assembly May 24, 1967, strike out "in effect as of", and insert "which becomes effective on or after".

Amendment No. 1

July 25, 1967

5591

Senate and the Assembly concurred in amendment to Assembly Bill No. 850 by the following vote: The roll was called.

ASSEMBLY JOURNAL

AYES—Badham, Bagley, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Crown, Davis, Deddeh, Dent, Dulky, Dunlap, Blliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Karabian, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Milias, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Wakefield, Warren, Wilson, Zberg, Zenovich,

and Mr. Speaker—71. NOES—None.

Assembly Bill No. 850 ordered enrolled.

Assembly Bill No. 1147—An act to amend Section 139.5 of the Civil Code and to add Sections 580.4 and 580.5 to the Welfare and Institutions Code, relating to county fees and charges. The question being: Shall the Assembly concur in the following Senate amendments to Assembly Bill No. 1147?

#### Amendment No. 1

In lines 3 and 4 of the title of the printed bill, as amended in Assembly June 1, 1967, strike out "service charges to probation officers", and insert "county fees and

#### Amendment No. 2

On page 2, between lines 4 and 5, insert
"In order to defray expenses incurred by the district attorney in the enforcement
of a child support order, when a district attorney undertakes to enforce a child
support order under this section, the court may, by motion on notice or by order to
show cause, order the party-obligated to make support payments to pay to the
county an additional amount as reasonable attorney fees, not to exceed 5 percent of
the payments collected as a result of the enforcement, and such sum shall be deposited in the county general fund.
This section shall not be applicable in any county unless the board of supervisors
thereof has voted to have it apply."

#### Amendment No. 3

On page 2, line 10, after "1687", insert ", inclusive,".

The roll was called, and the Assembly concurred in the Senate amendments to Assembly Bill No. 1147 by the following vote: AYES—Badham, Bagley, Bear, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandal, Crown, Cullen, Davis, Deddeh, Dent, Duffy, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Levoy F. Greene, Hayes, Harvey Johnson, Karabian, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Mosters, Millias, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veneman, Veysey, Wakefield, Warren, Z'berg, and Zenovich—72.

Assembly Bill No. 1147 ordered enrolled.

# THIRD READING OF ASSEMBLY BILLS (RESUMED)

Assembly Bill No. 2077—An act to amend Sections 9801, 9810, 9817, mencing with Section 9900) to Division 3 of, the Business and Pro-9825, and 9871 of, to add Section 101.5 to, and add Chapter 21 fessions Code, relating to automotive repair dealers.

Bill read third time.

### Demand for Previous Question

Messrs. Murphy, Ryan, McMillan, Deddeh, and Britschgi demanded the previous question. Demand sustained

The question being on the passage of the bill

Bill passed by the following vote

AYES—Bagley, Bear, Bee, Belotti, Brathwaite, Brown, Burton, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Hayes, Karabian, MacDonald, McMillan, Meyers, Miller, Negri, Porter, Powers, Quimby, Ralph, Roberti, Ryan, Shoemaker, Sierotty, Stacey, Thomas, Townsend, Vasconcellos, Warren, Z'berg, and Zenovich—42.

NOES—Badham, Beverly, Biddle, Briggs, Britschgi, Burke, Chappie, Collier, Conrad, Dent, Harvey Johnson, Ray E. Johnson, Ketchum, Lanterman, Millas, Worlread, Mulford, Murphy, Priolo, Russell, Schabarum, Veneman, Wakefield, and Wilson—24.

Bill ordered transmitted to the Senate.

## BILL REMOVED FROM CONSENT CALENDAR

On request of Mr. Dunlap Senate Bill No. 1350 was removed from the Consent Calendar.

Above bill ordered replaced on the second reading file, pursuant to Joint Rule No. 22.2.

## CONSIDERATION OF CONSENT CALENDAR

The Acting Speaker announced that the next roll call would be on the first item on the Consent Calendar

## CONSENT CALENDAR—ASSEMBLY BILLS

House Resolution No. 456—Relating to the Federal Bar Association.

NOTE: The full text of House Resolution No. 456 appears at pages 5326 and 5327 of the Assembly Daily Journal for July 17, 1967.

Resolution read, and adopted by the following vote;

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Brigs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Dufly, Dunlay, Elliotti, Fenton, Foors, Foran, Gonsalves, Bill Greene, Levoy E. Greene, Hayes, Harvey Johnson, Ray E. Johnson, Karabian, Ketchum, Knox, Lanterman, MacDonald, McGee, McMilan, Meyers, Milias, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veneman, Veysey, Wakefield, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—77. Veysey, Wanch NOES-None.

House Resolution No. 463—Relative to commending Paul F. Law-

463 appears at pages 5367 and NOTE: The full text of House Resolution No. 45368 of the Assembly Daily Journal for July 18, 1967.

Resolution read, and adopted by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Duffy, Dunlap, Elliott, Fenton,

#### ASSEMBLY JOURNAL July 25, 1967

Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Marchaman, MacDonald, McGee, McMilan, Meyers, Milias, Milier, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Staey, Thomas, Townsend, Vasconcellos, Veneman, Veysey, Wakefield, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—77. eysey, Wakenel NOES—None.

House Resolution No. 465—Relating to congratulating Dr. Margaret Storkan. NOTE: The full text of House Resolution No. 465 appears at pages 5368 and 5369 of the Assembly Daily Journal for July 18, 1967.

Resolution read, and adopted by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Griegs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Duffy, Dunlap, Elliott, Fenton, Tong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Karabian, Ketchum, Knox, Lanterman, MacDonald, McGee, Mo-Milan, Meyers, Milas, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Sgri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, enabarum, Shoemaker, Sierofy, Stacey, Thomas, Townsend, Vasconcellos, Veneman, Speegy, Wakefield, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—77. eysey, Wakefiel NOES—None.

## CONSENT CALENDAR—SENATE BILLS

Senate Bill No. 566—An act to amend Section 11553 of the Educason Code, relating to computation of average daily attendance of mentally retarded minors.

Bill read third time, and passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Sriggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Camdall, Crown, Cullen, Davis, Deddeh, Dent, Duffy, Dunlap, Elliott, Fenton, Cons. Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Rarabian, Retchum, Knox, Lanterman, MacDonald, McGee, McMerti, Mayers, Milias, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Nert, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Labarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veneman, York, Wakefield, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—77. MOES—None.

Bill ordered transmitted to the Senate.

Senate Bill No. 600-An act to amend Section 74341 of the Govfarent Code, relating to courts.

Dill read third time, and passed by the following vote:

EBS—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Mallo, Crown, Cullen, Davis, Deddele, Dent, Duffy, Dunlay, Elliott, Fenton, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harrey Johnson, Mayers, Milas, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Rusal, Murphy, Ratte, Borter, Powers, Priolo, Quimby, Ralph, Roberti, Rusal, Ryan, Maren, Shoenaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veneman, Wilson, Z'berg, Zenovich, and Mr. Speaker—77. -None.

in ordered transmitted to the Senate.

ASSEMBLY JOURNAL

Senate Bill No. 610—An act to amend Section 2416 of the Vehicle Sode, relating to emergency vehicles.

Bill read third time, and passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Duflay, Dunlay, Eliotti, Fenton, Frong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harrey Johnson, Millan, Meyers, Millar, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Raiph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsed, Vasconcellos, Veneman, Veyer, Wakefield, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—77. Veysey, Wakene-NOES-None.

Bill ordered transmitted to the Senate.

Senate Bill No. 887.—An act to repeal Section 2 of Chapter 1576 of the Statutes of 1965, relating to migratory agricultural workers.

Bill read third time, and passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Duffy, Dunlap, Elliott, Fenton, Frong, Foran, Gonsalves, Bill Greene, Levey F. Greene, Hayes, Harvey Johnson, Milan, Meyers, Milas, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsed, Vasconcellos, Veneman, Veyeys, Wakefield, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—77. Veysey, Wakener NOES—None.

Bill ordered transmitted to the Senate.

Senate Bill No. 1054—An act to add Section 1160.5 to the Harbors and Navigation Code, relating to bar pilots, declaring the urgency thereof, to take effect immediately.

Bill read third time.

**Urgency Clause** 

Urgency clause read, and adopted by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Duflay, Dunbap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Levey F. Greene, Hayes, Harvey Johnson, Milan, Meyers, Milias, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priole, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsed, Vasconcellos, Veneman, Veyey, Wakefield, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—77. NOES

The question being on the passage of the bill

Bill passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Dudley, Britsch, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harrey Johnson, Ray E. Johnson, Karabian, Ketchum, Knox, Lanterman, MacDonald, McGee, McMeri, Pattee, Porter, Powers, Pricho, Quimby, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Pricho, Quimby, Ralph, Roberti, Russell, Ryan, Veyey, Wakefield, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—77. Veysey, Wakenel NOES—None.

Bill ordered transmitted to the Senate.

ASSEMBLY JOURNAL

Senate Bill No. 1233—An act to add Section 25304.5 to the Government Code, relating to elective county offices.

Bill read third time, and passed by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Cramball, Crown, Cullen, Davis, Duddeh, Dert, Duffy, Dunlay, Ellore, Fonton, Fong, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Ray E. Johnson, Karabian, Ketchum, Knox, Lanterman, MacDonald, McGee, McMilan, Meyers, Milas, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veneman, Veyers, Wakefield, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—77. Veysey, Wakener NOES—None.

Bill ordered transmitted to the Senate.

Senate Joint Resolution No. 32—Relative to a study of the San Joaquin River channel

Resolution read, and adopted by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Duffy, Dunlap, Elliott, Fenton, Fong, Fong, Foran, Gonsalves, Bill Greene, Levoy F. Greene, Hayes, Harvey Johnson, Ray E. Johnson, Karabian, Ketchum, Knox, Lanterman, MacDonald, McGee, McMilan, Meyers, Milias, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Ryan, Schabarum, Shoemaker, Sierofty, Stacey, Thomas, Townsed, Vasconcellos, Veneman, Vegesey, Wakefield, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—77. 'eysey, Wakefie NOES—None.

Resolution ordered transmitted to the Senate.

The following resolutions were offered:

By Assemblyman Vasconcellos:

#### House Resolution No. 490

Relative to commending Albert J. Ruffo

WHEREAS, One of California's most outstanding leaders in civic and community affairs is Albert J. Ruffo, presently one of the Trustees of the California State Colleges; and
WHEREAS, In 1961, Albert J. Ruffo was appointed to the board of trustees, serving ably as an effective chairman of the board from 1965 to 1967; and
WHEREAS, His sincere interest and untiring efforts have been a contributing factor in the development of the California State Colleges into one of the nation's most renowned institutions of public higher education; and WHEREAS, Mr. Ruffo has distinguished himself in service to local government, serving proficiently as a San Jose City Councilman from 1944 to 1952, and as

Mayor from 1946 to 1948; and WHEREAS, His athletic achievements and his continuing skillful teaching of athletics have carned for him a place in the Santa Clara University Hall of Fame (1963), and the Tacoma, Pierce County, Washington, Sports Hall of Fame (1964);

WHEBEAS, In 1945, he served as assistant football coach at the University of California, leaving to coach the San Francisco "49er's"; and WHEBEAS, He is a respected and honored member of the legal profession, in 1936 receiving his Bachelor of Laws degree from the University of Santa Clara, serving from 1953 to 1956 on the Board of Governors of the State Bar of California, and upon completion of his second year was named Vice President of the Bar Association; and where the Bar Association; and where the Bar of California, public higher education, and his effective statesmanship, in addition to his warm personality and friendly manner, quickly gained and richly earned him the reputation of being one of California's most dynamic public men; and

July 25, 1967

WHEREAS, Mr. Ruffo served the cause of public higher education with migh degree of integrity in the performance of all his duties, as evidenced by the lasting degree of integrity in the performance of all his duties, as evidenced and admirational harmonic harmonic harmonic harmonic harmonic harmonic confidence and admiration of his colleagues on the board of trustees and also the faculty, officers and staff of the California State Colleges; now, therefore, be it

Resolved by the Assembly of the State of California, That the Members take this opportunity to commend Mr. Albert J. Ruffo upon the occasion of his retirement from the chairmanship of the Board of Trustees of the California State Colleges for his exemplary and devoted service as a trustee in behalf of public higher education and to express the hope that the people of California will continue to have the benefit of his ability and experience for many years to come; and be it

Resolved, That the Chief Clerk of the Assembly is hereby directed to transmit a suitably prepared copy of this resolution to Trustee Albert J. Ruffo.

Request for Unanimous Consent

Mr. Vasconcellos was granted unanimous consent to take up House Resolution No. 490 without reference to committee or file.

Resolution read, and adopted.

NOTE: Later this day all Members of the Assembly were added as

coauthors to House Resolution No. 490.

By Assemblyman Mulford

House Resolution No. 491

Relative to commending John Edgar Hoover

WHEREAS, John Edgar Hoover has rendered exceptional service to the people of the United States for fifty years in various positions in the Department of Justice and has been Director of the Federal Burau of Investigation since 1924; and the Department of the Velecial Burau of Investigation since 1924; and where Director of the Federal Burau of Investigation since 1924; and where the Director of the Federal Burau of Investigation since 1924; and has been Director of the Versident of the United States), the Distinguished Service Clustion of the All-American Conference Gold Medal of Merit citation for outstanding service in safeguarding the security of the United States, the Distinguished Service Clustion of the All-American Conference to Combat Communism, and the Americanism Gold Medal Award and Citation of the VHEREASS. Mr. Hoover's contribution to the personal security and safety of WHEREASS. Mr. Hoover's contribution to the personal security and safety of the advancement of brotherhood among all races, creeds and colors and for his WHEREAS. Mr. Hoover also has been well known for his unswerving devotion and the advancement of brotherhood among all races, creeds and colors and for his wing teenagers; and on the advancement of brotherhood among all races, creeds and colors and office.

Besolved by the Assembly of the Senate of the United States passed are resolution commending where the Nation'; now, therefore, be it Resolved by the Assembly of the State of California, That the Members commend Resolved by the Assembly of the Assembly be hereby directed to transmit and Resolved, That the Chief Clerk of the Assembly be hereby directed to transmit and suitably prepared copy of this resolution to John Edgar Hoover.

Mr. Mulford was granted unanimous consent to take up House Reso-

lution No. 491 without reference to committee or file.

Resolution read

Members Made Coauthors of House Resolution No. 491

Mr. Mulford was granted unanimous consent that all Members 50 desiring be placed upon House Resolution No. 491 as coauthors.

Badham, Bagley, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschei, Burke, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Cullen, Davis, Dedden, Burke, Campbell, The following Assemblymen indicated a desire to become coauthors:

ASSEMBLY JOURNAL

Dent, Duffy, Dunlap, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Ray E. Johnson, Karabian, Ketchum, Lanterman, MacDanld, McGee, McMilan, Meyers, Milias, Miller, Mobley, Moorhed, Moretti, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Unruh, Vasconcellos, Veneman, Veysey, Wakefield, Warren, Wilson, Z'berg and Zenovich.

Resolution read, as amended, and adopted unanimously

THIRD READING OF ASSEMBLY BILLS (RESUMED) CONSIDERATION OF DAILY FILE (RESUMED)

House Resolution No. 446—Relative to National 4-H Week.

446 appears at pages 5281 and NOTE: The full text of House Resolution No. 4 5282 of the Assembly Daily Journal for July 14, 1967.

Resolution read, presented by Mr. Ray E. Johnson.

Members Made Coauthors of House Resolution No. 446

Mr. Johnson was granted unanimous consent that all Members so desiring be placed upon House Resolution No. 446 as coauthors.

Roll Call

The following Assemblymen indicated a desire to become coauthors:

Badham, Bagley, Barnes, Bear, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Button, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Crown, Cullen, Davis, Deddeh, Dent, Duffy, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Karbhan, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Millas, Miller, Moorbead, Moretti, Mullord, Murphy, Negri, Pattee, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Bussell, Schabarum, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcelloš, Veneman, Veysey, Wakefield, Warren, Wilson, Z'berg, and

Resolution read, as amended, and adopted unanimously

REQUEST FOR UNANIMOUS CONSENT TO TAKE UP SENATE BILL NO. 1376 Mr. Quimby was granted unanimous consent to take up Senate Bill No. 1376, out of order, for purpose of amendment

CONSIDERATION OF SENATE BILL NO. 1376—OUT OF ORDER-BY UNANIMOUS CONSENT Senate Bill No. 1376—An act to amend Sections 194 and 194.2 of the Streets and Highways Code, relating to streets and highways.

Bill read third time.

Request for Unanimous Consent to Temporarily Suspend the Rules

Mr. Quimby was granted unanimous consent that the Rules be temporarily suspended for the purpose of permitting him to offer amendments to Senate Bill No. 1376 which add a total of more than 25 words to the bill, without having copies of the amendments placed upon the Members' desks.

#### ASSEMBLY JOURNAL

Mr. Quimby moved the adoption of the following amendments: Motion to Amend

#### Amendment No. 1

In line a of the title of the printed bill, as amended in Assembly June 13, 1967, after "of", insert ", and to amend and renumber Sections 194 and 194.2 of,".

#### Amendment No. 2

Section 194 of the Streets and Highways Code is amended On page 3, after line 13, insert

be apportioned monthly to the cities and cities and counties of this expend or cause to be expended within the cities and cities and counties The commission shall allocate annually, and the department shall per gallon tax under the Motor Vehicle Fuel License Tax Law shall state from the Highway Users Tax Fund as provided in this section. 194. 2107. A sum equal to 72.5 percent of one cent (\$0.00725) and renumbered to read:

of this state, from the State Highway Fund, the amount transferred to the State Highway Users Tax Fund for

expenditure in cities, = provided in Section 2107.

of the annexed territory, by multiplying the number of registered electors therein by three or, at the election of the city, the population In the case of uninhabited unincorporated territory being annexed to so city subsequent to the last census, the department shall ascertain the population of the annexed territory, by the use of any federal decennial or special census or an estimate pursuant to Section 194.2 or, if no such other estimate or census was made, by multiplying the number of registered electors therein by three two years after the comannexed territory may be ascertained pursuant to Section 2107.2. 2107.2 by which the population of the annexed territory was counted, pletion of annexation proceedings or at such earlier time as the legiscensus, the department shall ascertain the population of the city, or the purpose of this section the population in each city is that determined by the last preceding federal census. In the case of a city incorcorporated territory being annexed to a city subsequent to the last Such expenditures apportionments shall be made within to each city, including city and county, in the proportion that the total population of such city bears to the total population of all cities in this state. For porated subsequent to the last census, or in the case of inhabited uninative body may request.

Section 194.2 of the Streets and Highways Code is amended

and renumbered to read:

information upon which to base the estimate; provided, however, the information if, in the opinion of the department, such additional insubsequent to the last federal census. The department may make the estimate if in the opinion of the department there is available adequate department may develop or contract for the development of additional 194.2. 2107.2. On and after July 1, 1958, any Any city or city and ulation or the population of any inhabited territory annexed to the city county may apply to the Department of Finance to estimate its pop-

formation may make an estimate feasible. Upon completion of the estimate, the Department of Finance shall file a certified copy thereof with the department and the Controller.

ASSEMBLY JOURNAL

ments under Section 11005 of the Revenue and Taxation Code for any in making the computations required by these sections, shall add to All allocations apportionments under Section 194 2107 and all payallocation apportionment subsequent to the filing of the estimate shall the total population of all cities and cities and counties all increases be based upon the population so estimated. The respective departments,

of population shown by the estimate. -The Department of Finance may assess a reasonable charge, not to mates pursuant to this section, which is a proper charge against the exceed the actual cost thereof, for the preparation of population estibe deposited in the State Treasury as a reimbursement to be credited to the appropriation from which the expenditure is made. city or city and county applying therefor. The amount received shall

Population estimates conducted pursuant to this section shall not be applied for more frequently than once in every calendar year. This section does not apply to counties.

Sec. 5. Sections 3 and 4 of this act shall become operative only if Assembly Bill No. 2454 is enacted by the Legislafure at its 1967 Regular Session, and in such case at the same time as Assembly Bill No. 2454 takes effect; at which time Sections 194 and 194.2 of the Streets and Highways Code as amended by Sections 1 and 2 of this act are repealed."

Amendment read, and adopted.

Bill ordered reprinted, and to be returned to third reading.

#### RESOLUTIONS

The following resolutions were offered:

By Assemblymen Ketchum and McGee:

#### House Resolution No. 492

Resolved by the Assembly of the State of California, That the Committee on Rules is directed to assign to an appropriate committee for study the subject of the manufacture of office furniture in correctional institutions in order to determine the cost of such manufacture = compared with the cost of such manufacture by private industry and the effects of such manufacture on the private furniture industry and that such committee be directed to report its findings thereon to the Assembly not later than the fifth day of the 1968 Regular Session of the Legislature. Relative to the manufacture of office furniture in correctional institutions

Resolution read, and referred by the Acting Speaker to the Committee on Rules.

By Assemblyman Ryan:

Relative to the Brisbane, California, and Brisbane, Australia, House Resolution No. 493 sister-city program

WHEREAS, As Franklin Roosevelt stated in his fourth inaugural address "We have learned that we cannot live alone, at peace, that our own well-being is dependent on the well-being of other nations, far away. . . . .; and WHEREAS, The sister-city program offers many opportunities for international

understanding; and

WHEREAS, The cities of Brisbane in San Mateo County, California, and Brisbane, Queensland, Australia, have decided to establish such 

sister-city relationship!

ASSEMBLY JOURNAL

WHEREAS, Mayor and Mrs. Dale With of Brisbane, California, will be the

guests of the City of Brisbane, Australia, during its annual "Warana" or "bh skies" spring festival from September 29th to October 7th; now, therefore, be it

Resolved by the Assembly of the State of California, That the members thereof commend the cities of Brisbane, California, and Brisbane, Australia, on their sister-city programs; and be it further of the Assembly is directed to send suitably pre-Resolved, That the Chief Clerk of the Assembly is directed to send suitably prepared copies of this resolution to Mayor Dale With of Brisbane, California, the City Council of Brisbane, California, the Lord Mayor of Brisbane, Australia, Clem Jones, and the City Council of Brisbane, Australia.

Resolution read, and referred by the Acting Speaker to the Committee on Rules.

#### By Assemblyman Knox

#### House Resolution No. 494

Resolved by the Assembly of the State of California, That the Assembly Committee on Rules is requested to refer for study to an appropriate committee the subject of the desirability of state financing for persons boarding wards of the juvenile court in private homes for the purposes of giving such wards = homelike environment, special instruction in basic academic subjects, and comprehensive manual training; and be it further the Committee on Rules is requested to direct the committee to Resolved. That the Committee on Rules is requested to direct the committee to Assembly not later than the fifth legislative day of the 1968 Regular Session of Relative to  $\blacksquare$  study of financing persons who board juvenile court wards

the Legislature.

Resolution read, and referred by the Acting Speaker to the Committee on Rules.

### By Assemblyman Cory

#### House Resolution No. 495

Relative to the Society of Aerospace Material and Process Engineers

WHEREAS, The Society of Aerospace Material and Process Engineers, SAMPE, is an organization dedicated to the advancement of materials-and-process technology for the Aerospace Industry, which technology is recognized as dependent upon a unique combination of creative abilities, training and education; and

WHEREAS, The Society organizes and conducts biannual symposiums and exhibitions throughout the United States where exhibits and technical papers are presented by Industry, Army, Navy, Air Force, and NASA representatives for the sented by Industry, Army, Navy, Air Force, and NASA representatives for the purpose of furthering the aims and objectives of the organization; and WHEREAS, The Orange County Chapter of SAMPE is sponsoring the 12th National Symposium and Exhibition with the theme, "Advances in Structural Com-

posites"; and WHEREAS, The Symposium and Exhibition is to be held at the new Anaheim WHEREAS, The Symposium and 12, 1967; now, therefore, be it Convention Center during October 10, 11, and 12, 1967; now, therefore, be it

late the Society of Aerospace Material and Process Engineers upon the occasion of this 12th National Symposum and Exhibition; and be it further Resolved, That the Chief Clerk of the Assembly be hereby directed to transmit a suitably prepared copy of this resolution to the Orange County Chapter of SAMPE. Resolved by the Assembly of the State of California, That the Members congradu-

Resolution read, and referred by the Acting Speaker to the Commit-

By Assemblyman Bagley:

#### House Resolution No. 496

### Relating to court administration

Resolved by the Assembly of the State of California, That the Assembly Rules Committee be directed to assign to an appropriate committee for study the subject of court administration, including, but not limited to a one-level trial court system, changes in the emphasis of court administration from the county level to the state level, methods of reducing the cost of civil litigation, judicial selection and tenure, and court consolidation, and to direct such committee to report its findings and recommendations thereon to the Assembly not later than the fifth legislative day of the 1968 Regular Session of the Legislature.

Resolution read, and referred by the Acting Speaker to the Com- $\mathbf{mittee}$  on  $\mathbf{Rules}$ 

By Assemblyman Bagley:

#### House Resolution No. 497

Relating to civil court procedure

Resolved by the Assembly of the State of Oalifornia, That the Assembly Rules Committee be directed to assign to an appropriate committee for study the subject of civil court procedure, including, but not limited to, the adoption of the federal rules of procedure for the California courts and an examination of special problems in California court procedure, and to direct such committee to report its findings and recommendations thereon to the Assembly not later than the fifth legislative day of the 1968 Regular Session of the Legislature.

Resolution read, and referred by the Acting Speaker to the Committee on Rules.

By Assemblyman Bagley:

#### House Resolution No. 498

Relating to family courts ..

Resolved by the Assembly of the State of California, That the Assembly Bules Committee be directed to assign to an appropriate committee for study the subject of family courts, and to direct such committee to reports its findings and recommendations thereon to the Assembly not later than the fifth legislative day of the 1968 Regular Session of the Legislature.

Resolution read, and referred by the Acting Speaker to the Committee on Rules.

By Assemblyman Bagley:

#### House Resolution No. 499

Relating to probate and trust matters

Resolved by the Assembly of the State of California, That the Assembly Rules Committee be directed to assign to an appropriate committee for study the subject of probate and trusts, including, but not limited to, the use of the California Uniform Gifts to Minors Act for testamentary gifts, the expansion and improvement of the nonjudicial administration of estates, inter vivos trust problems, incorporation by reference in wills of statutes and "bolicrplate" clauses, and general revision of the Probate Code, and to direct such committee to report its findings and recommendations thereon to the Assembly not later than the fifth legislative day of the 1968 Regular Session of the Legislature.

Resolution read, and referred by the Acting Speaker to the Committee on Rules.

#### By Assemblyman Bagley

5602

#### House Resolution No. 100

Relating to inheritance tax

Resolved by the Assembly of the State of California, That the Assembly Rules Committee be directed to assign to an appropriate committee for study the subject of the revision of the California inheritance tax laws to conform more closely to federal laws relating to death taxes, and to direct such committee to report its findings and recommendations thereon to the Assembly not later than the fifth logislative day of the 1968 Regular Session of the Legislature.

Resolution read, and referred by the Acting Speaker to the Com-

mittee on Rules.

### By Assemblyman Bagley:

#### House Resolution No. 501

Relating to securities regulation

Resolved by the Assembly of the State of California, That the Assembly Rules Committee be directed to assign to an appropriate committee for study the subject of securities regulation, including, but not limited to, the meaning and effect of comparison of the California system with the federal system of such regulation, and an evaluation of recently proposed extensive amendments to the California and an evaluation of recently proposed extensive amendments to the California of Corporate Securities Law, and to direct such committee to report its findings and recommendations thereon to the Assembly not later than the fifth legislative day recommendations thereon of the Legislature.

Resolution read, and referred by the Acting Speaker to the Committee on Rules.

By Assemblyman Bagley:

#### House Resolution No. 502

Resolved by the Assembly of the State of California, That the Assembly Rules O Committee be directed to assign to an appropriate committee for study the subject of administrative procedure, including, but not limited to, an examination of discovery up in administrative proceedings if a bill providing for such discovery is not enacted at procedure act for local government, and consideration of an administrative procedure act for local government, and to direct such committee to report its findings and recommendations thereon to the Assembly not later than the fifth legislative and agy of the 1968 Regular Session of the Legislature.

Resolution read, and referred by the Acting Speaker to the Committee on Rules.

By Assemblyman Bagley!

House Resolution No. 505

Resolved by the Assembly of the State of California, That the Assembly Rules Committee be directed to assign to an appropriate committee for study the subject of debtor-creditor rights and remedies, and to direct such committee to report its findings and recommendations thereon to the Assembly not later than the fifth legislative day of the 1968 Regular Session of the Legislature. Relating to debtor-creditor rights and remedies

Resolution read, and referred by the Acting Speaker to the Com-

By Assemblyman Bagley: mittee on Rules.

#### House Resolution No. 504

Relating to traffic infractions

Resolved by the Assembly of the State of California, That the Assembly Rules Committee be directed to assign to an appropriate committee for study the subject

ASSEMBLY JOURNAL July 25, 1967 of the adjudication of traffic infractions, and to direct such committee to report its findings and recommendations thereon to the Assembly not later than the fifth legislative day of the 1968 Regular Session of the Legislature.

Resolution read, and referred by the Acting Speaker to the Committee on Rules.

## REPORTS OF STANDING COMMITTEES

#### Committee on Rules

Assembly Chamber, July 25, 1967

Mr. Speaker: Your Committee on Rules recommends:

That the request by Mr. Barnes for permission to introduce a resolution dispensing with the limitation contained in Article IV, Section 8(a), of the Constitution as it pertains to Assembly Bill No. 2597 be granted.

#### RESOLUTIONS

The following resolution was offered

By Assemblyman Barnes:

## Resolution to Invoke Constitutional Provision

Resolved, That, pursuant to Article IV, Section 8(a), of the Constitution, Asmbly Bill No. 2597 may be heard in committee and acted upon by the Assembly before 30 calendar days have elapsed.

Resolution read, and adopted by the following vote:

AYES—Badham, Bagley, Barnes, Bear, Bee, Belotti, Beverly, Biddle, Brathwaite, Briggs, Britschgi, Brown, Burke, Burton, Campbell, Chappie, Collier, Conrad, Cory, Crandall, Chown, Cullen, Davis, Deddeh, Dent, Duffy, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy F. Greene, Hayes, Harvey Johnson, Ray E. Johnson, Karabian, Ketchum, Knox, Lanterman, MacDonald, McGee, McMillan, Meyers, Milias, Miller, Mobley, Moorhead, Moretti, Mulford, Murphy, Negri, Porter, Powers, Priolo, Quimby, Ralph, Roberti, Russell, Schabarum, Shoemaker, Stacey, Thomas, Townsend, Vasconcellos, Veneman, Veysey, Wakefield, Warren, Wilson, Z'berg, Zenovich, and Mr. Speaker—73.

Article IV, Section 8(a) of the Constitution was declared dispensed

## REQUESTS FOR UNANIMOUS CONSENT TO TEMPORARILY SUSPEND THE RULES

Mr. Barnes was granted unanimous consent that the Assembly Rules be temporarily suspended for the purpose of setting Assembly Bill No. 2597 for hearing in the Committee on Government Organization.

Mr. Foran was granted unanimous consent that the Assembly Rules be temporarily suspended for the purpose of setting Assembly Bill No. 2196 for hearing in the Committee on Transportation and Commerce. Mr. Knox was granted unanimous consent that the Assembly Rules County Govern-Senate Bill No. be temporarily suspended for the purpose of setting 385 for hearing in the Committee on Municipal and ment on Wednesday, July 26, 1967.

#### REQUEST FOR UNANIMOUS CONSENT TO SET SENATE BILL NO. 402 FOR SPECIAL ORDER

Mr. Knox was granted unanimous consent that Senate Bill No. 402. be made a special order of business for Wednesday, July 26, 1967, at 11 a.m.

## REQUEST FOR UNANIMOUS CONSENT TO TEMPORARILY SUSPEND THE RULES

Mr. Britschgi was granted unanimous consent that the Assembly Rules be temporarily suspended for the purpose of setting Senate Bill No. 1247 for hearing in the Committee on Education today.

## REQUEST FOR UNANIMOUS CONSENT TO RESCIND ACTION ON ASSEMBLY BILL NO. 1541

whereby the Assembly, on July 21, 1967 (Assembly Journal, page relative to Senate Bill No. 1541, and whereby the bill was ordered to 5494), received and read the report of the Committee on Education second reading; and whereby on July 24, 1967 (Assembly Journal, page 5543) Senate Bill No. 1541 was read a second time in the Assembly, Mr. Britschgi was granted unanimous consent to rescind the action and ordered to third reading.

Request for Unanimous Consent to Temporarily Suspend the Rules

Mr. Britschgi was granted unanimous consent that the Assembly Rules be temporarily suspended for the purpose of setting Senate Bill

No. 1541 for hearing in the Committee on Education.

## REQUEST FOR UNANIMOUS CONSENT TO RESCIND ACTION ON SENATE BILL NO. 1542

5494), received and read the report of the Committee on Education relative to Senate Bill No. 1542, and whereby the bill was ordered to bly, committee amendments to the bill read and adopted, and whereby whereby the Assembly, on July 21, 1967 (Assembly Journal, page page 5543), Senate Bill No. 1542 was read a second time in the Assem-Mr. Britschgi was granted unanimous consent to rescind the action second reading; and whereby on July 24, 1967 (Assembly Journal, the bill was ordered reprinted, returned to the second reading file, and to be placed on the Consent Calendar. Ronald Reagan-2005

Request for Unanimous Consent to Temporarily Suspend the Rules

Mr. Britschgi was granted unanimous consent that the Assembly Rules be temporarily suspended for the purpose of setting Senate Bill

No. 1542 for hearing in the Committee on Education.

# MEMBERS MADE COAUTHORS OF HOUSE RESOLUTION NO. 490

Mr. Vasconcellos was granted unanimous consent that all Members of the Assembly be placed upon House Resolution No. 490 as coauthors.

## REQUEST FOR UNANIMOUS CONSENT TO TEMPORARILY SUSPEND THE RULES

1489 for hearing in the Committee on Finance and Insurance on Thursday, July 27, 1967. be temporarily suspended for the purpose of setting Senate Bill No. Mr. Moretti was granted unanimous consent that the Assembly Rules

ASSEMBLY JOURNAL July 25, 1967

## CAUCUS ANNOUNCEMENTS

Mr. Shoemaker announced that there would be a Democratic Caucus immediately upon adjournment today, in Room 4168.

### APPROVAL OF JOURNALS

On motion of Mr. Shoemaker, the Assembly Daily Journals for Monday, July 17, 1967; Tuesday, July 18, 1967; Wednesday, July 19, 1967, Thursday, July 20, 1967, and Friday, July 21, 1967, were approved, as corrected by the Minute Clerk.

## REPORTS OF STANDING COMMITTEES

## Committee on Engrossment and Enrollment

Assembly Chamber, July 25, 1967 Mr. Speaker: Your Committee on Engrossment and Enrollment has examined: Assembly Bill No. 1535

And reports the same correctly re-engrossed.

STACEY, Chairman Above bill ordered returned to second reading file.

## Committee on Finance and Insurance

Assembly Chamber, July 25, 1967 Mr. Speaker: Your Committee on Finance and Insurance reports:

Senate Bill No. 1160 Senate Bill No. 1262 Senate Bill No. 1315

With the recommendation: Do pass.

Pursuant to the provisions of Joint Rules Nos. 22.1, 22.2, and 22.3, the committee recommends that the above bills be placed on the Consent Calendar. MORETTI. Chairman

Above bills ordered to second reading.

Assembly Chamber, July 25, 1967 Mr. Speaker: Your Committee on Finance and Insurance reports: Senate Bill No. 593

Above bill ordered to second reading.

With amendments with the recommendation: Amend, and do pass, as amended.

MORETTI, Chairman

Assembly Chamber, July 25, 1967 Mr. Speaker: Your Committee on Finance and Insurance reports:

With the recommendation: Do pass. Senate Bill No. 198

Above bill ordered to second reading.

MORETTI, Chairman

### Committee on Ways and Means

Assembly Chamber, July 25, 1967 Mr. Speaker: Your Committee on Ways und Means reports:

Senate Bill No. 967 Senate Bill No. 961 Senate Bill No. 962 Senate Bill No. 1159 Senate Bill No. 1159 Senate Bill No. 1528 Senate Bill No. 1528 Senate Bill No. 1528 Senate Bill No. 1528 Senate Bill No. 118
Senate Bill No. 698
Senate Bill No. 704
Senate Bill No. 728
Senate Bill No. 767
Senate Bill No. 767
Senate Bill No. 835
Senate Bill No. 835
Senate Bill No. 844
Senate Bill No. 844

With the recommendation 1 Do pass.

CROWN, Chairman

Above bills ordered to second reading.

Assembly Chamber, July 25, 1967

Mr. Speaker: Your Committee on Ways and Means reports:

Assembly Bill No. 466 Assembly Bill No. 925 Assembly Bill No. 926

Assembly Bill No. 1711 Assembly Bill No. 2085 Assembly Bill No. 2364

With the recommendation: Do pass.

CROWN, Chairman

Above bills ordered to second reading.

Assembly Chamber, July 25, 1967 Mr. Speaker: Your Committee on Ways and Means reports:

Senate Bill No. 638 Senate Bill No. 1165

Senate Bill No. 1325 Senate Bill No. 1525

and 22.3, the committee CROWN, Chairman Pursuant to the provisions of Joint Rules Nos. 22.1, 22.2, and 22. recommends that the above bills be placed on the Consent Calendar. With the recommendation: Do pass.

Above bills ordered to second reading

Assembly Chamber, July 25, 1967

Mr. Speaker: Your Committee on Ways and Means reports:

CROWN, Chairman With amendments with the recommendation: Amend, and do pass, m amended. Senate Bill No. 311

Above bill ordered to second reading.

Committee un Finance and Insurance

Assembly Chamber, July 25, 1967

Chairman of your Committee on Finance and Insurance Speaker: The

Senate Bill No. 1489 reports:

With author's amendments with the recommendation: Amend, and re-refer to the Committee on Finance and Insurance.

# SECOND READING OF BILLS-AUTHOR'S AMENDMENTS

Senate Bill No. 1489—An act to amend Section 7799 of the Insurance Code, relating to insurance.

Bill read second time.

Consideration of Author's Amendments

Was The following amendment, pursuant to the Assembly Rules, Amendment No. 1 read, and adopted:

On page 1, strike out lines 12 to 17, inclusive, of the printed bill, and insert "The benefits provided by any such policy form shall be deemed reasonable in relation to the premium charged or to be charged if the ratio of losses incurred to premiums earned is 50 percent or may reasonably be expected to be 50 percent. Determination of a reasonable relation of benefits to premiums shall be made by the commissioner for each policy form filed for approval. The commissioner may limit the use of any such form to those creditors or debtors whose experience was the basis for approval and such other creditors or debtors likely to experience similar mortality or morbidity. The commissioner shall require insurer to file such in mortality or determine that this standard is met each two years or more often in his discretion. Upon giving such notice as is required by years or more often may withdraw approval of any such form on the ground law, the commissioner may withdraw approval of any such form on the ground higher reasonable relation of benefits to premiums no longer exists or may approve higher rate if justified by experience. Notwithstanding any provisions of Sections 18661, 18661.1, and 22458.1 of the Financial Code to the contrary, the method of rate supervision set forth in this

ASSEMBLY JOURNAL

section shall be the method applied to all credit life or credit disability insurance within the scope of this article, to the end that a uniform of rate supervision may be adopted for credit life and credit disability insurance in this state. SEC. 2. The provisions of this act shall become operative on January 1, 1968."

and to be re-referred to the Committee on Bill ordered reprinted, Finance and Insurance.

## REPORTS OF STANDING COMMITTEES

Committee on Public Health

Assembly Chamber, July 24, 1967 Mr. Speaker: The Chairman of your Committee on Public Health reports: Senate Bill No. 490 With author's amendments with the recommendation: Amend, and re-refer to the Committee on Public Health.

# SECOND READING OF BILLS—AUTHOR'S AMENDMENTS

Senate Bill No. 490—An act to add Section 24363 to, to add Division 26 (commencing with Section 39000) to, and to repeal Article 9 (commencing with Section 425) of Chapter 2 of Part 1 of Division 1 and Chapter 3 (commencing with Section 24378) of Division 20 of, the Health and Safety Code, relating to air pollution, and making an appropriation therefor.

Bill read second time.

## Consideration of Author's Amendments

The following amendments, pursuant to the Assembly Rules, were read, and adopted:

#### Amendment No. 1

On page 3, between lines 7 and 8, of the printed bill, as amended in Senate July 17,

1967, insert "Local or regional authority" includes the governing body of any city, county, city and county, and of any air pollution control district which is functioning and exercising its powers."

On page 3, strike out lines 25 and 26, and in line 27, strike-out "within a regional district,". Amendment No. 2

Ronald Reagan-2006

#### Amendment No.

On page 3, strike out lines 38 to 43, inclusive; and in line 44, strike out "regional district", and insert "undertake enforcement activities only after it has determined that the local or regional authorities have failed to meet the ambient air quality standards set by the state board for that basin".

#### Amendment No. 4

On page 4, line 4, strike out "13", and insert "14".

#### Amendment No. 5

On page 4, line 10, after "Health," insert "Director of Motor Vehicles,".

#### Amendment No. 8

On page 4, line 49, strike out the comma; strike out lines 50 and 51, and 52, strike out "district,". Amendment No. 7

## On page 5, line 13, strike out ", or portion of m basin,"; strike out lines 14 and 15, and insert "as found". Amendment No. 8

On page 5, lines 33 and 34, strike out "regional districts and county districts", and insert "local or regional authorities".

#### Amendment No. 🖣

ASSEMBLY JOURNAL

strike out lines 43 to 45, inclusive; and in line 46, strike out "county ", and insert "with within a basin or that any local or regional On page 5, district board authority'

#### Amendment No. 10

strike out "regional board or the district board", and insert On page 5, line 48, strike out "such local or regional authority"

#### Amendment No. 11

On page 5, line 51, strike out "regional or district", and insert "local or regional".

#### Amendment No. 12

strike out the first "board", and insert "or regional authority". Amendment No. 13 On page 6, line 2,

On page 6, line 5, strike out "regional board, or district board", and insert "local or regional authority".

#### Amendment No. 14

On page 6, strike out lines 6 to 11, and insert "able action. If any local or regional authority does not comply with the directive of the board within 30 days after the date of the directive, the board shall enforce the standards and the rules and regulations adopted by the board pursuant to this part within the area under the jurisdiction of such local or regional authority until such time as the directive is withdrawn by the board or regional authority comples with the directive. Every person who violates any standard, rule or regulation adopted by the board pursuant to this part in any area in which such standards, rules, and regulations are being enforced by the board is guilty of a misdemeanor. Every day during any portion of which such violation occurs constitutes a separate offense.

This section does not authorize the board to enforce in any area under the jurisdiction of any local or regional authority its standards, rules, or regulations relating to emissions from motor vehicles, with respect to motor vehicles registered to owners residing in any area to which the provisions of subdivisions (c) and (d) of Section 39000 are made inapplicable by subdivisions (k) or (l) of that section."

#### Amendment No. 15

d 18, strike out "individual county or regional districts", regional authority". On page 6, lines 17 and 18, and insert "any local or regio

#### Amendment No. 16

On page 6, line 22, strike out "county or regional board", and insert "local or regional authority".

#### Amendment No. 17

#### On page 20, between lines 16 and 17, insert "39438. Every person who violates any provision of this article or any order, rule, or regulation of the regional board is guilty of a misdemeanor. Every day, during any portion of which such violation occurs constitutes a separation. rate offense. Ronald Reagan-2007

#### On page 20, line 17, strike out "39438", and insert "39439" Amendment No. 18

#### Amendment No. 19

On page 20, line 20, strike out "39439", and insert 39440".

#### and to be re-referred to the Committee on Bill ordered reprinted, Public Health

## REPORTS OF STANDING COMMITTEES

## Committee on Ways and Means

Assembly Chamber, July 25, 1967

Mr. Speaker: The Chairman of your Committee on Ways and Means reports: Assembly Bill No. 2006

Assembly Bill No. 240

With author's amendments with the recommendation: Amend, and re-refer to the Committee on Ways and Means. CROWN, Chairman

ASSEMBLY JOURNAL

 $July\ 25,\ 1967$ 

# SECOND READING OF BILLS-AUTHOR'S AMENDMENTS

with Section 9166) to Division 7 of, to amend Section 17303.5 of, and to repeal Article 14 (commencing with Section 6421) of Chapter 6 of Di-Assembly Bill No. 2006—An act to add Chapter 7 (commencing vision 6 of, the Education Code, relating to the education of mentally gifted minors.

Bill read second time.

## Consideration of Author's Amendments

The following amendments, pursuant to the Assembly Rules, were read, and adopted

#### Amendment No. 1

On page 3, line 42, of the printed bill, manended in Assembly July 18, 1967, strike out "service", and insert "services".

#### Amendment No.

On page 8, strike out line 27, and insert (e) Eighty cents (\$0.80) during the fiscal year 1967–1968, and two dollars and plied by the". (\$2.90) for the fiscal year 1968–1969 and fiscal years thereafter, multiplied by the".

#### Amendment No.

On page 8, strike out lines 34 and 35, and insert "ing the fiscal year 1964-1965, thirty-six dollars and fifty-five cents (\$36.55) for the fiscal years 1965-1966 and 1966-1967, and thirty-four dollars and forty-five cents (\$34.45) for the fiscal years 1967-1968 and fiscal."

Bill ordered reprinted, re-engrossed, and to be re-referred to the Committee on Ways and Means.

Assembly Bill No. 240—An act to add Section 1020 to the Military and Veterans Code, relating to Veterans' Home of California, and makng an appropriation therefor.

Bill read second time.

## Consideration of Author's Amendments

The following amendments, pursuant to the Assembly Rules, were read, and adopted:

#### Amendment No. 1

in Assembly April 11, 1967, On page 1, line 4, of the printed bill, as amended strike out ", or construct mew facility.".

#### Amendment No. 2

thousand dollars (\$500,000)". On page 1, lines 7 and 8, strike out "five hundred thou and insert "two hundred fifty thousand dollars (\$250,000)"

#### Amendment No. 3

On page 2, line 7, strike out "Veterans", and insert "Veterans'

#### Amendment No. 4

On page 2, line 6, strike out ", or constructing a new facility,".

Bill ordered reprinted, re-engrossed, and to be re-referred to the Committee on Ways and Means.

5610

## REPORTS OF STANDING COMMITTEES

Assembly Chamber, July 25, 1967 Committee on Public Utilities and Corporations

Mr. Speaker: The Chairman of your Committee m Public Utilities and Corpor-

Senate Bill No. 255

With author's amendments with the recommendation: Amend, and re-refer to the Committee on Public Utilities and Corporations.

# SECOND READING OF BILLS-AUTHOR'S AMENDMENTS

Senate Bill No. 255—An act to add Sections 21643 and 21644 to the Public Utilities Code, relating to obstructions near airports.

Bill read second time.

## Consideration of Author's Amendments

The following amendment, pursuant to the Assembly Rules, was read, and adopted:

Amendment No. 1

On page 1, line 6, of the printed bill, as amended in Senate July 6, 1967, strike out "publicly owned airport", and insert "airport open to public use".

Bill ordered reprinted, and to be re-referred to the Committee on Public Utilities and Corporations.

## REPORTS OF STANDING COMMITTEES

Committee on Revenue and Taxation

Mr. Speaker: The Chairman of your Committee on Revenue and Taxation reports: Assembly Chamber, July 24, 1967 Senate Bill No. 837

With author's amendments with the recommendation: Amend, and re-refer to the Committee on Revenue and Taxation. VENEMAN, Chairman

# SECOND READING OF BILLS-AUTHOR'S AMENDMENTS

ately preceding Section 51030 of, and to add Article 2 (commencing Senate Bill No. 837-An act to add a new article heading immediwith Section 51100) to Chapter 6 of Division 1 of Title 4 of, the Government Code, relating to a real property transfer tax.

Bill read second time.

## Consideration of Author's Amendment's

The following amendments, pursuant to the Assembly Rules, were read, and adopted

In the heading of the printed bill, as amended in Senate July 13, 1967, immediately below "Introduced by Senator Teale", insert "(Coauthor: Assemblyman Stacey)". Amendment No. 1

Set No. 2

Amendment No. 1

Strike out lines 4 to B, inclusive, of the title of the printed bill, as amended in Eenate July 13, 1967, and insert "Part 6.7 (commencing with Section 11901) to Division 2 of the Revenue and Taxation Code,".

July 25, 1967

ASSEMBLY JOURNAL

On page 1, strike out lines 4 to 6, inclusive, and insert "Section 1. Part 6.7 (commencing with Section 11901) is added to Division of the Revenue and Taxation Code, to read:

DOCUMENTARY STAMP ACT PART 6.7.

This act is known and may be cited as the "Documentary Stamp Act." "Board" means the State Board of Equalization. "County" shall include = city and county. "Recorder" means the recorder of = county. 11901 11902 11904

CHAPTER 2. AUTHORIZATION FOR TAX

ordinance, may impose, on each deed, instrument, or writing by which any lands, tenements, or other resity sold within the county shall be granted, assigned, transcother person or persons, by his or their direction, when the consideration or any of the interest or property conveyed (exclusive of the value of any lien or enaming thereon at the time of sale) exceeds one hundred dollars (\$500) or fractional part thereof.

\*\*Deficiency of any city which is within a county which has imposed ment, or writing by which any lands, tenements, or other realty sold within the city when the granted, assigned, transferred, or otherwise conveyed to, or vested in the city purchaser or purchasers, or any other person or persons. By his or their direction, the value of any lien or encumbrance remaining thereon at the time of sale) exceeds subdivision (a) for each five hundred dollars (\$100) at tax at the rate of one-half the amount specified in (c) A credit shall be allowed against the tax imposed by a county ordinance of an ordinance adopted pursuant to subdivision (a) for the amount of any tax due to any city by reason of an ordinance adopted pursuant to subdivision (b). No credit shall be allowed against the tax imposed by a county ordinance of an ordinance adopted pursuant to subdivision (b). No credit shall be allowed

against any county tax for city tax which is not in conformity with this part.

11912. Any tax imposed pursuant to Section 11911 shall be paid by any I 11912. Any tax imposed pursuant to Section 11911 shall be paid by who makes, signs or issues any document or instrument subject to the whose use or benefit the same is made, signed or issued.

CHAPTER 3. EXEMPTIONS

in writing given to secure a debt.

In writing given to secure a debt.

In 1922. The United States or any agency or instrumentality thereof, any state or territory, or political subdivision thereof, or the District of Columbia shall not instrument, or writing to which it is a party, but the tax may be collected by assessment from any other party liable therefor.

In 1923. Any tax imposed pursuant to this part shall not apply to the making, delivering or filing of conveyances to make effective any plan of reorganization or

(a) Confirmed under the Federal Bankruptcy Act, us amended | (b) Approved in an equity receivership proceeding in a court involving u railroad States Code, as amended;

(c) Approved in an equity receivership proceeding in a court involving a corporation, as defined in subdivision (3) of Section 506 of Title 11 of the United States

Whereby a mere change in identity, form or place of organization is effected.

11925. (a) In the case of any realty held by a partnership, no levy shall be imposed pursuant to this part by reason of any transfer of an interest in a partnership Such conveyance is made in obedience to such order.

(2) Such continuing partnership continues to hold the realty concerned.

(b) If there is a termination of any partnership within the meaning of Section 708 of the Internal Revenue Code of 1954, for purposes of this part, such partnership shall be treated as having executed an instrument whereby there was conveyed, ship shall be treated as having executed an instrument whereby there was conveyed, for fair market value (exclusive of the value of any lien or encumbrance remaining thereon, all realty held by such partnership at the time of such termination.

(c) Not more than one tax shall be imposed pursuant to this part by a county, city and county or city by reason of a termination described in subdivision (b), and any transfer pursuant thereto, with respect to the realty held by such partnership and any. (1) Such partnership (or another partnership) is considered a continuing partnership within the meaning of Section 708 of the Internal Revenue Code of 1954;

ship at the time of such termination.

### CHAPTER 4. ADMINISTRATION

stamps in suitable denominations to be affixed to the deeds, instruments and writstamps in suitable denominations to be affixed to the deeds, instruments and writings subject to the tax authorized by this part. The board shall sell such stamps to county recorders at the actual cost to the board of printing and distributing the

11932. The recorder of a county which has adopted an ordinance pursuant to 11932, and shall sell the stamps at their denominated values, and shall report no information to the board with respect to sales of stamps, except for purposes of information to the board with respect to sales of stamps, except for purposes of 11933. The recorder of a county which has adopted an ordinance pursuant to 11933. The record any deed, instrument or writing subject to the tax imposed pursuant to this part, unless the stamps described in Section 11931 are posed pursuant to this part, unless the stamps described in Section 11931 are posed pursuant to the party submitting the document for recordation, affixed thereto. If requested by the party submitting the document for recordation, record is made and before the original is returned as specified in Section 27321 of record is made and before the original is returned as specified in Section 27321 of the Government Code. However, the failure to affix any such stamp shall not affect the constructive notice otherwise imparted by recording such deed, instrument or

All amounts collected by the recorder pursuant to Section 11932 shall be transmitted as promptly as feasible to the board.

CHAPTER 5. OVERPAYMENTS AND REFUNDS

11951. If the board determines that any amount, penalty, or interest has been board and shall set forth that fact in the records of the board and shall certify to the board shall set forth that fact in the records of the board and shall certify to the State Board of Control the amount of the county, city and county or city tax collected in excess of the amount legally due and the person from whom it was collected or by whom paid. If approved by the State Board of Control the excess amount collected or paid shall be credited by the board on any amounts then due and payable from the person from whom the excess amount was collected or by whom it was paid under this part, and the balance shall be refunded to the person, whom it was paid under this part, and the balance shall be refunded to the person, or his successors, administrators, or executors from the county, city and county or Stamp Fund.

In the case, however, of a determination by the board that an amount not exceeding two hundred fifty dollars (\$250) was not required to be paid under this part, the board without obtaining approval of the State Board of Control may credit the amount on any amounts then due and payable under this part from the person the amount was paid and may refund the balance to the person or his by whom the amount was paid and may refund the balance to the person or his successors, administrators, or executors from the county, city and county or city revenues derived from a tax imposed pursuant to this part in the Documentary

11952. A claim for refund shall be made by the taxpayer to the board within six months after any tax authorized by this part has been paid to the county re-

Every claim shall be in writing and shall state the specific grounds

upon which the claim is founded.

11954. The board may require such information as it deems necessary from the county recorder with respect to any transfer to which a claim relates and shall county recorder disallow the claim within 60 days after it has been filed either allow or disallow the claim within the time prescribed in this article constitutes a waiver of any demand against the county, city and county or city on

account of overpayment.

July 25, 1967

#### ASSEMBLY JOURNAL

11956. Within 30 days after disallowing any claim in whole or in part the board shall serve notice of its action on the claimant by depositing such notice in the United States mail addressed to the claimant at the address shown on the claim

or to such other address as the claimant shall provide.

11957. No interest shall be allowed on any overpayment.

11958. No injunction or writ of mandate or other legal or equitable process shall issue in any suit, action, or proceeding in any court against any county, city or cuty or any officer thereof to prevent or enjoin the collection of any levy or any amount of tax required to be collected pursuant to an ordinance adopted this part.

11959. No suit or proceeding shall be maintained in any court for the recovery of any amount alleged to have been erroneously or illegally determined or collected unless a claim for retund or credit has been duly filed pursuant to Section 11952.

11960. Within 90 days after the mailing of the notice of the board's action upon a claim filed pursuant to Section. 11952, the claimant may bring an action against the board as the agent of the county, city and county or city on the grounds set forth in the claim in a court of competent jurisdiction in any city or city and county of this state in which the Attorney General has an office for the recovery of the whole or any part of the amount with respect to which the claim has been disallowed.

waiver of any Failure to bring action within the time specified constitutes a waiver of any demand against the county, city and county or city on account of alleged overpay-

after the claim is filed, the claimant may, prior to the mailing of notice by the board of its action on the claim, consider the claim disallowed and bring an action against the board as the agent of the county, city and county or city on the grounds set forth in the claim for the recovery of the whole or any part of the amount If the board fails to mail notice of action on a claim within six 11961.

Ronald Reagan-2009

claimed as an overpayment.

11962. If judgment is rendered for the plaintiff, the amount of the judgment shall first be creditied on any levy due and payable from the plaintiff pursuant to any ordinance adopted under this part. The balance of the judgment shall be refunded to the plaintiff from the county, city and county or city revenues derived from a tax pursuant to this part in the Documentary Stamp Fund.

11963. In any judgment, no interest shall be allowed.

11964. A judgment shall not be rendered in favor of the plaintiff in any action brought against the board as agent of any county, city and county or city to recover any amount paid when the action is brought by or in the name of an assignee of the person paying the amount or by any person other than the person

who paid the amount.

11965. The Controller may recover any refund or part thereof which

neously made and any credit or part thereof which is erroneously allowed in an action brought in a court of competent jurisdiction in the County of Sacramento as the agent of the county, city and county or city affected.

11966. The action shall be tried in the County of Sacramento unless the court with the consent of the Attorney General orders a change of place of trial.

11967. The Attorney General shall prosecute the action, and the provisions of the Code of Civil Procedure relating to service of summons, pleadings, proofs, trials, and appeals are applicable to the proceedings.

## CHAPTER 6. DISPOSITION OF PROCEEDS

required to be paid to any county, city and county or city under this part shall be transmitted to the board by county, recorders in the form of remitrances payable to the Board of Equalization of the State of California. The board shall transmit the payments to the State Treasurer to be deposited in the State Treasury to the credit of the Documentary Stamp Fund, which is hereby created.

11972. All money deposited in the Documentary Stamp Fund under this part is hereby continuously appropriated without regard to fiscal years and shall be drawn therefrom upon order of the State Controller for refunds under this part and the remaining balance shall be transferred by the Controller as follows:

(a) To pay the overhead and general administrative expense of the Controller and the board attributable to the duties imposed by this part.

(b) The balance remaining shall be paid periodically, not less than quarterly, to each of the several counties in this state. Each such county shall receive an amount equal to the remittances received from it pursuant to this part, less refunds attributable to such county and less the county's pro rata share of the expenses specified in subdivision (a). Upon the receipt of funds by a county pursuant to this subdivision (a). Upon the receipt of funds by a county pursuant to this subdivision the auditor of the county shall allocate the funds as follows:

(1) All money which relates to transfers of real property located in unincorporated areas of the county or city and county, as the case may be.

(2) All money which relates to transfers of real property located in a city which

imposes a tax in conformity with the provisions of this part on transfers of real property shall be allocated one-half to such city and one-half to the county.

(3) All money which relates to transfers of real property located in a city which does not impose a tax on transfers of real property or which imposes a tax which not in conformity with this part shall be allocated entirely to the county.

SEC. 2. No city or county shall directly or indirectly impose a tax on transfers of real property which is not in conformity with this part. As used in this section, city, does not include a chartered city or hardrend city and county.

SEC. 3. The provisions of this act shall be operative on and after 12:01 a.m. on

January 2, 1968.

Sec. 4. Notwithstanding the provisions of Section 3, if the Congress of the Sec. 4. Notwithstanding the provisions of real property on or before January United States provides for a tax on transfers of real property. If the Congress of the United States imposes a tax on transfers of real property after January 2, 1968, this act shall have no operative effect on and after the first day of the fiscal year which follows the date such federal tax is imposed."

Amendment No. 3

Strike out all of pages 2 to 4, inclusive, and on page 5, strike out lines 1 to 33,

Amendment No. 4

On page 8, strike out lines 27 to 36, inclusive.

Bill ordered reprinted, and to be re-referred to the Committee on Revenue and Taxation

## REQUEST FOR UNANIMOUS CONSENT TO TEMPORARILY SUSPEND THE RULES

Mr. Thomas was granted unanimous consent that the Assembly Rules rent Resolution No. 128 for hearing in the Committee on Transportation be temporarily suspended for the purpose of setting Assembly Concurand Commerce on Wednesday, July 26, 1967.

#### CALL OF THE ASSEMBLY DISPENSED WITH ON ASSEMBLY BILL NO. 1226

At 11:58 a.m., on motion of Mr. Meyers further proceedings under the call of the Assembly were dispensed with.

The names of the absentees were called.

#### Call of the Assembly

Pending the announcement of the vote, Mr. Meyers moved a call of the Assembly.

Mr. Elliott seconded the motion.

Motion carried. Time, 11:55 a.m.

The Acting Speaker directed the Sergeant at Arms to close the doors, and to bring in the absent Members.

#### PROCEEDINGS UNDER CALL OF THE ASSEMBLY ANNOUNCEMENTS OF COMMITTEE MEETINGS BY UNANIMOUS CONSENT

It was announced that the following committee would hold meetings: Today

On Wednesday, July 26, 1967-

Room 4203

At 1:30 p.m., instead of 3:45 p.m.—Revenue and Taxation (Veneman, Chairman) in Room 2170.

ASSEMBLY JOURNAL  $July\ 25,\ 1967$ 

## BILLS WITHDRAWN FROM INACTIVE FILE

The following bill was withdrawn from the inactive file, and placed upon the third reading file:

Assembly Bill No. 1452, on request of Mr. Bagley.

#### CALL OF THE ASSEMBLY DISPENSED WITH ON ASSEMBLY BILL NO. 1226

At 12:29 p.m., by unanimous consent, further proceedings under the call of the Assembly were dispensed with.

The names of the absentees were called, and Assembly Bill No. 1226 refused passage by the following vote:

AYES—Bagley, Bear, Bee, Belotti, Brathwaite, Brown, Burton, Crown, Cullen, Beckeh, Duffy, Dunlap, Elliott, Fenton, Fong, Foran, Gonsalves, Bill Greene, Leroy Milias, Miller, Mobley, Moretti, Negri, Porter, Powers, Quimby, Ralph, Roberts, Ryan, Shoemaker, Sieroty, Stacey, Thomas, Townsend, Vasconcellos, Veneman, Warren, Z'berg, Zenovich, and Mr. Speaker—48.

NOES—Badham, Biddle, Briggs, Bristchgi, Burke, Collier, Conrad, Cory, Crandall, Bavis, Dent, Hayes, Ketchum, Lanterman, Moorhead, Mulford, Murphy, Priolo, Russell, Schabarum, Wakefield, and Wilson—22.

NOTE: Later this day a motion to reconsider the vote whereby Assembly Bill No. 1226 was refused passage was offered by Mr. Meyers.

## COMMITTEE MEETING ANNOUNCEMENTS

Acting Speaker Badham announced that the following committees would meet today:

At 1:45 p.m., instead of 1:30 p.m.—

Transportation and Commerce

Education Subcommittee on School Programs

Education Subcommittee on School Finance

At 4 p.m., instead of 3:45 p.m.

Education

Government Organization Criminal Procedure

Public Health

#### REPORT

The following letter of transmittal was presented by the Speaker, and ordered printed in the Journal:

Assembly Committee on Government Organization Letter of Transmittal

The California State Assembly Mr. James Driscoll, Chief Clerk

State Capitol, Sacramento, California

Dear Mr. Driscoll: I am herewith transmitting the report of Attorney General Thomas C. Lynch on the Del Mar Bace Track Leasing  $\mathbf{Procedures}$ .

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Chairman)

(Veneman,

At 1:30 p.m.—Revenue and Taxation

Ronald Reagan-2010

July 25, 1967

The report was requested by the Government Organization Committee as part of an investigation into the need for legislation concerning the leasing of the Del Mar Race Track.

Very sincerely,

### HARVEY JOHNSON

Above report referred by the Speaker pro Tempore to the Committee on Government Organization.

# MOTION TO RECONSIDER ASSEMBLY BILL NO. 1226 ON NEXT LEGISLATIVE DAY

Mr. Meyers moved to reconsider on the next legislative day the vote whereby Assembly Bill No. 1226 was this day refused passage.

Assembly Bill No. 1226 ordered to the unfinished business file.

#### RESOLUTIONS

The following resolution was offered:

By Assemblyman Conrad:

House Resolution No. 505

Relating to the 25th Anniversary of the Motion Picture Country House and Hospital and the Dedication of the Louis B. Mayer Memorial Center

WHEREAS, It has come to the attention of the Members of the Assembly that the Motion Picture and Television Relief Fund's Country House and Hospital is celebrating its 25th year; and WHEREAS, This unique organization has, during these 25 years, been wholly supported by members of the motion picture industry whose motto is "we take care of our own"; and

WHEREAS, The inaugural event of the celebration will be the dedication of the Louis B. Mayer Memorial Center on July 30, 1967; and the Louis B. Mayer Memorial Center on July 30, 1967; and WHEREAS, This new complex will provide Country House residents with a modern motion picture theater and full facilities for an occupational therapy pro-

gram; and WHEREAS, Louis B. Mayer was one of the founders of the Motion Picture Relief Fund in 1927, and was voted an Honorary Award by the Academy of Motion Picture Arts and Sciences in 1951; and WHEREAS, He was elected seven times as President of the Association of Motion Picture Producers and was cited by his country, state, and local community for patriotic, civic, and charitable endeavors, as well as being decorated by foreign

governments; and WHEREAS, It was his wish that the urgent needs of the Motion Picture WHEREAS, It was his wish that the terms putlined in his will when Country House have preference in carrying out the terms putlined in his will when he passed on in 1957; now, therefore, be it

Resolved by the Assembly of the State of California, That the Members take this opportunity to express congratulations and best wishes to the Motion Picture Country House and Hospital upon the occasion of its 25th Anniversary; and be Ronald Reagan-2011

Resolved, That the Chief Clerk of the Assembly is hereby directed to transmit suitably prepared copies of this resolution to George L. Bagnall, President of the Motion Picture and Television Relief Fund, and to the Louis B. Mayer Foundation. it further

Resolution read, and referred by the Speaker pro Tempore to the Committee on Rules.

ASSEMBLY JOURNAL

#### REPORTS OF STANDING COMMITTEES Committee on Rules

Assembly Chamber, July 25, 1967 Mr. Speaker: Your Committee on Rules reports: Senate Bill No. 1539

With the recommendation: Do pass.

Pursuant to the provisions of Joint Rules Nos. 22.1, 22.2, and 22.3, the committee recommends that the above bill be placed on the Consent Calendar.

GONSALVES, Chairman

Above bill ordered to second reading.

Assembly Chamber, July 25, 1967 Mr. Speaker: Your Committee on Rules reports:

Senate Concurrent Resolution No. 38 Senate Concurrent Resolution No. 31

With the recommendation: Be adopted

Pursuant to the provisions of Joint Rules Nos. 22.1, 22.2, and 22.3, the committee recommends that the above resolutions be placed on the Consent Calendar.

GONSALVES, Chairman

Assembly Chamber, July 25, 1967

Above resolutions ordered on file.

Mr. Speaker: Your Committee on Rules reports: House Resolution No. 316

With the recommendation: That the resolution be re-referred to the Committee on

Above resolution re-referred to the Committee on Education

Assembly Chamber, July 25, 1967 Mr. Speaker: Your Committee on Rules reports:

Assembly Concurrent Resolution No. 94 With the recommendation: Be adopted. Above resolution ordered engrossed.

GONSALVES, Chairman

Assembly Chamber, July 25, 1967 Mr. Speaker: Your Committee on Rules reports: ~

House Resolution No. 477 House Resolution No. 479

With the recommendation: Be adopted.

Pursuant to the provisions of Joint Rules Nos. 22.1, 22.2, and 22.3, the committee recommends that the above resolutions be placed on the Consent Calendar.

GONSALVES, Chairman

Above resolutions ordered on file.

Assembly Chamber, July 25, 1967 Mr. Speaker: Your Committee on Rules reports:

House Resolution No. 471

With the recommendation: That the resolution be re-referred to the Committee on Ways and Means.

Above resolution re-referred to the Committee on Ways and Means.

Assembly Chamber, July 25, 1967 Mr. Speaker: Your Committee on Rules reports:

House Resolution No. 474

With the recommendation: That the resolution be re-referred to the Committee on Natural Resources, Planning, and Public Works.

Above resolution re-referred to the Committee on Natural Resources, GONSALVES. Chairman Planning, and Public Works.

## Committee on Finance and Insurance

Assembly Chamber, July 25, 1967 Mr. Speaker: Your Committee on Finance and Insurance reports:

With amendments with the recommendation: Amend, and do pass, as amended. MORETTI, Chairman Senate Bill No. 1027

Above bill ordered to second reading.

## Committee on Engrossment and Enrollment

Assembly Chamber, July 25, 1967

Assembly Bill No. 910—An act to amend and renumber the heading of Chapter 3 (commencing with Section 62801), Part 3, Division 21 of, to add Chapter 3 (commencing with Section 62700) to Part 3, Division 21 of, and to repeal Article 16 (commencing with Section 62771) of Chapter 2, Part 3, Division 21 of, the Agricultural Code as proposed by Senate Bill No. 1, relating to milk, and making an Mr. Speaker: Your Committee on Engrossment and Enrollment has examined: appropriation therefor;

And reports the same correctly enrolled, and presented to the Governor at 4 p.m., July 25th, 1967. STACEY, Chairman

## Committee on Government Organization

Assembly Chamber, July 25, 1967

Speaker: The Chairman of your Committee on Government Organization

Senate Bill No. 1327

With author's amendments with the recommendation: Amend, and re-refer to the Committee on Government Organization. HARVEY JOHNSON, Chairman

# SECOND READING OF BILLS—AUTHOR'S AMENDMENTS

Senate Bill No. 1327-An act to establish the American Revolution Bicentennial Commission of California.

Bill read second time.

## Consideration of Author's Amendments

The following amendments, pursuant to the Assembly Rules, were read, and adopted:

Amendment No. 1

In the heading of the printed bill, as amended in Senate July 13, 1967, "Whetmore", insert "(Coauthor: Assemblyman Ryan)".

#### Amendment No. 2

On page 3, line 40, strike out "American Bicentennial Fund," strike out lines 41 and 42, and insert "Special Deposit Fund subject to the provisions of Article 2 (commencing with Section 16370) of Chapter 2 of Part 2 of Division 4 of Title 2 of the Government Code. The State Controller shall designate, by name, a separate account within the Special Deposit Fund covering the accountability for each class of grant or donation deposited under the provisions of this section.

All moneys deposited in the Special Deposit Fund under the provisions of this section is appropriated, without regard to fiscal years, for expenditure for the pure of the provision of this section.

poses for which such money was made available to the commission."

Bill ordered reprinted, and to be re-referred to the Committee on Government Organization

## APPOINTMENTS TO COMMISSIONS

ASSEMBLY JOURNAL

Speaker Unruh announced the appointment of Assemblymen Robert Badham and Walter Karabian as members of the California Bicentennial Celebration Commission.

## REFERENCE OF BILLS TO COMMITTEE

Speaker pro Tempore Bee announced that Speaker Unruh has referred the following bills to the following committees:

Senate

Bill No.

359

Committee

Revenue and Taxation

Senate Concurrent Resolution No.

Rules

#### **ADJOURNMENT**

At 4:20 p.m., Speaker pro Tempore Bee declared the Assembly adjourned until 9 a.m., Wednesday, July 26, 1967.

JESSE M. UNRUH, Speaker

ANABEL WHANG, Minute Clerk

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